

EXHIBIT

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL) MDL No. 2804
PRESCRIPTION OPIATE) Case No. 17-md-2804
LITIGATION) Judge Dan Aaron Polster
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)

ORAL AND VIDEOTAPED DEPOSITION OF
HENRY REYES
August 17, 2023
Volume 1

ORAL AND VIDEOTAPED DEPOSITION OF HENRY REYES,
produced as a witness at the instance of the Defendant,
and duly sworn, was taken in the above-styled and
numbered cause on the 17th day of August, 2023, from
10:05 a.m. to 12:42 p.m., via videoconference, before
Abigail Guerra, CSR, in and for the State of Texas,
reported by machine shorthand, where all attendees
appeared via Zoom in their respective locations,
pursuant to the Federal Rules of Civil Procedure and the
provisions stated on the record or attached hereto.

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1 A P P E A R A N C E S
 (Appearing Remotely)

2

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22 Exhibit 8 Standard Operating Procedures 56

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1 A P P E A R A N C E S (cont'd)
 (Appearing Remotely)

2

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<p style="text-align: right;">Page 7</p> <p>1 THE VIDEOGRAPHER: We're on the record at</p> <p>2 10:04 a.m. on August 17th, 2023. This is the deposition</p> <p>3 of Henry Reyes in the matter of In Re: National</p> <p>4 Prescription Opiate Litigation, filed in the Northern</p> <p>5 District of Ohio, Eastern Division, case No. 17-MD-2804.</p> <p>6 This deposition is being conducted remotely.</p> <p>7 At this time, counsel, please state your</p> <p>8 appearances for the record beginning with the noticing</p> <p>9 attorney.</p> <p>10 MS. HARRIS: This is Kimberly Harris from</p> <p>11 Quilling Selander on behalf of the Kroger defendants.</p> <p>12 MR. FORD: Quinn Ford on behalf of the</p> <p>13 Albertsons.</p> <p>14 MR. RYAN: Tony Ryan with Bowles Rice firm</p> <p>15 on behalf of Kroger.</p> <p>16 MS. AYACHI: And my name is Leila Ayachi,</p> <p>17 Lanier Law Firm on behalf of Tarrant County, and I'm</p> <p>18 joined by Alex Abston also from Lanier Law Firm and</p> <p>19 Sadie Turner.</p> <p>20 MR. KRATOVIL: I'm Mark Kratovil. I'm with</p> <p>21 the Tarrant Criminal District Attorneys Office, and we</p> <p>22 serve as counsel for all Tarrant County departments and</p> <p>23 employees.</p> <p>24 HENRY REYES,</p> <p>25 having been first duly sworn, testified as follows:</p>	<p style="text-align: right;">Page 9</p> <p>1 A. Okay.</p> <p>2 Q. (BY MS. HARRIS) All right.</p> <p>3 MS. HARRIS: Everybody good? Y'all got it</p> <p>4 open? All right.</p> <p>5 MS. AYACHI: Yes.</p> <p>6 MS. HARRIS: Perfect.</p> <p>7 Q. (BY MS. HARRIS) If you could go ahead and</p> <p>8 state your full name for the record.</p> <p>9 A. Henry Reyes.</p> <p>10 Q. Okay.</p> <p>11 And you are represented by counsel today?</p> <p>12 Mr. Kratovil; is that correct?</p> <p>13 A. Correct.</p> <p>14 Q. All right.</p> <p>15 And I'm guessing -- and tell me if I'm</p> <p>16 incorrect, but he's provided to you by Tarrant County</p> <p>17 because you're a former employee of Tarrant County; is</p> <p>18 that right?</p> <p>19 A. Correct.</p> <p>20 Q. All right.</p> <p>21 Have you ever been deposed before?</p> <p>22 A. Yes.</p> <p>23 Q. All right.</p> <p>24 And how many times?</p> <p>25 A. Twice.</p>

<p style="text-align: right;">Page 10</p> <p>1 Q. Twice.</p> <p>2 What type of cases were those? And what</p> <p>3 was your role?</p> <p>4 A. One of them was a personal matter where I was</p> <p>5 the plaintiff in a federal lawsuit or in a lawsuit. And</p> <p>6 the second was, I was a witness for -- in a car</p> <p>7 accident, so I was deposed as a witness for the</p> <p>8 accident.</p> <p>9 Q. Okay.</p> <p>10 And neither of those involved prescription</p> <p>11 opioids or substance abuse? Any of those things,</p> <p>12 correct?</p> <p>13 A. Correct.</p> <p>14 Q. All right.</p> <p>15 Where are you located right now for this</p> <p>16 deposition?</p> <p>17 A. I'm here at Fort Worth at the district</p> <p>18 attorney's office.</p> <p>19 Q. All right.</p> <p>20 Is there anybody else in the room with you</p> <p>21 other than your counsel, if he is in the room with you?</p> <p>22 A. No.</p> <p>23 Q. All right.</p> <p>24 A. Other than with counsel.</p> <p>25 Q. All right. Perfect.</p>	<p style="text-align: right;">Page 12</p> <p>1 A. That's fine.</p> <p>2 Q. Perfect.</p> <p>3 All right. And I'm sure you remember not</p> <p>4 to -- I'm going to let you finish your answer your, and</p> <p>5 if you'll let me finish my question, and then we'll both</p> <p>6 keep the court reporter happy, if that sounds good?</p> <p>7 A. Okay.</p> <p>8 Q. And if you hear me say "is that a 'yes'?" or</p> <p>9 "is that a 'no'?" instead of an "uh-uh" or "uh-huh,"</p> <p>10 please don't take it personal. I just want to make sure</p> <p>11 our record is clear. So when you read back through it,</p> <p>12 we'll know what your answer meant for sure.</p> <p>13 At times, you may hear an objection,</p> <p>14 "objection. Form." You can still go ahead and answer.</p> <p>15 And then also, if you ever need a break,</p> <p>16 let me know. I'm not trying to run a marathon here. So</p> <p>17 if you need to take time out, let me know.</p> <p>18 And the only thing that I ask if I just ask</p> <p>19 a question, if you go ahead and answer that question</p> <p>20 before we take a break.</p> <p>21 A. Okay.</p> <p>22 Q. All right. Perfect.</p> <p>23 Without getting into any specifics about</p> <p>24 the conversation, did you meet with anyone prior to your</p> <p>25 deposition?</p>
<p style="text-align: right;">Page 11</p> <p>1 You know, and by this deposition here</p> <p>2 today, basically what I'm here to do is find out what</p> <p>3 information you might have concerning this opioid</p> <p>4 litigation.</p> <p>5 And so do you have an understanding about</p> <p>6 what claims Tarrant County is making in this lawsuit?</p> <p>7 A. No.</p> <p>8 Q. All right.</p> <p>9 And you haven't read the complaint or</p> <p>10 anything like that?</p> <p>11 A. Correct.</p> <p>12 Q. All right.</p> <p>13 And since you've taken your deposition</p> <p>14 before, you kind of generally know the ground rules I'm</p> <p>15 betting. But I'm going to go over them again just so</p> <p>16 we're on the same page.</p> <p>17 It's under oath like you're before a judge</p> <p>18 or a jury.</p> <p>19 Let me know if you do not understand one of</p> <p>20 my questions. Sometimes I tend to talk a little fast,</p> <p>21 or sometimes Zoom will cut out a little bit. So let me</p> <p>22 know, and I will rephrase or reask the question.</p> <p>23 If you don't let me know, I think I'm just</p> <p>24 going to presume that you understood; is that okay with</p> <p>25 you?</p>	<p style="text-align: right;">Page 13</p> <p>1 A. Yes.</p> <p>2 Q. Did you meet with your attorney; is that right?</p> <p>3 A. Correct.</p> <p>4 Q. All right.</p> <p>5 How many occasions did y'all meet?</p> <p>6 A. Two.</p> <p>7 Q. Two occasions.</p> <p>8 About how long did -- total did y'all meet</p> <p>9 on...</p> <p>10 A. Total about an hour and a half.</p> <p>11 Q. Okay.</p> <p>12 Did you review any documents or other</p> <p>13 materials in preparation?</p> <p>14 A. No.</p> <p>15 Q. Okay.</p> <p>16 Did you speak with anybody else other than</p> <p>17 your attorney prior to the depo or about the depo?</p> <p>18 A. No.</p> <p>19 Other than to advise my supervisor that I</p> <p>20 had received the deposition; but, no.</p> <p>21 Q. Okay. Perfect. I understand.</p> <p>22 Are you taking any medications, or is there</p> <p>23 anything that might keep you from answering the</p> <p>24 questions today or understanding them today or being</p> <p>25 honest and truthful?</p>

<p style="text-align: right;">Page 14</p> <p>1 A. No.</p> <p>2 Q. Perfect.</p> <p>3 Basically just since you mentioned you</p> <p>4 don't necessarily know about Tarrant County's claims in</p> <p>5 this case, just so we have an understanding going</p> <p>6 forward about my questions, Tarrant County has sued</p> <p>7 Kroger and other chain pharmacies alleging that the</p> <p>8 pharmacies contributed to the opioid epidemic causing</p> <p>9 Tarrant County to lose money through various resources.</p> <p>10 And so my questions today are going to be based on that</p> <p>11 scenario a little bit.</p> <p>12 And excuse me for having to take a drink</p> <p>13 every once in a while. They did some construction here,</p> <p>14 so the dust is coming down in my office, and it's making</p> <p>15 me cough. So I'm apologizing in advance for that.</p> <p>16 Certain terms I'm going to use during this</p> <p>17 deposition. I want to make sure we have an agreement as</p> <p>18 far as the definition of them.</p> <p>19 What do you understand "opioids" to mean</p> <p>20 and include?</p> <p>21 A. Very basic understanding. It's just that</p> <p>22 they're a controlled substance or category-controlled</p> <p>23 substance. But in detail, I mean, I wouldn't be able to</p> <p>24 provide a definition.</p> <p>25 Q. And when you're thinking, would it include</p>	<p style="text-align: right;">Page 16</p> <p>1 medically necessary to prescribe them, that can be</p> <p>2 critically helpful to them, correct?</p> <p>3 MS. AYACHI: Objection, form.</p> <p>4 A. Yes.</p> <p>5 Q. (BY MS. HARRIS) Okay.</p> <p>6 And the doctor who is treating the patient,</p> <p>7 he would be in the best position to assess the medical</p> <p>8 necessity, correct?</p> <p>9 MS. AYACHI: Objection, form.</p> <p>10 A. Yes.</p> <p>11 Q. (BY MS. HARRIS) Okay.</p> <p>12 And even -- when prescribed properly,</p> <p>13 opioids can provide a benefit to someone suffering from</p> <p>14 acute or chronic pain.</p> <p>15 MS. AYACHI: Objection, form.</p> <p>16 A. I would assume so. I'm not a medical</p> <p>17 professional, so I don't know.</p> <p>18 Q. (BY MS. HARRIS) Totally understand. Thank</p> <p>19 you.</p> <p>20 All right. We'll go ahead and look to</p> <p>21 Tab 1 in the notebook first. I'm going to mark that as</p> <p>22 Exhibit 1, and that is just a copy of your LinkedIn</p> <p>23 profile.</p> <p>24 (Exhibit 1 marked.)</p> <p>25 A. Uh-huh.</p>
<p style="text-align: right;">Page 15</p> <p>1 illicit opioids such as heroin, fentanyl, cocaine,</p> <p>2 things like that along with prescription opioids?</p> <p>3 A. Yes.</p> <p>4 Q. Just basically the overall --</p> <p>5 A. Drugs.</p> <p>6 Q. -- all-inclusive controlled substances.</p> <p>7 All right. And then prescription opioids,</p> <p>8 those would be the ones that are FDA, DEA-approved, and</p> <p>9 legally available with a prescription from a healthcare</p> <p>10 provider; is that your understanding?</p> <p>11 MS. AYACHI: Objection, form.</p> <p>12 A. Yes.</p> <p>13 Q. (BY MS. HARRIS) Okay.</p> <p>14 And part of Tarrant County's claims are</p> <p>15 with regard to the dispensing of opioids.</p> <p>16 Do you understand what I'm talking about</p> <p>17 when I say "the dispensing of opioids"?</p> <p>18 A. Yes.</p> <p>19 Q. Do you believe that prescription opioids can</p> <p>20 have a legitimate medical use?</p> <p>21 MS. AYACHI: Objection, form.</p> <p>22 A. Yes.</p> <p>23 Q. (BY MS. HARRIS) Basically, there are people</p> <p>24 who have legitimate injuries. And if a healthcare</p> <p>25 provider -- if their healthcare provider finds it</p>	<p style="text-align: right;">Page 17</p> <p>1 Q. (BY MS. HARRIS) Does that look like what you</p> <p>2 remember your LinkedIn profile to look like?</p> <p>3 A. Yes.</p> <p>4 Q. Perfect.</p> <p>5 Do you know when the last time was you</p> <p>6 updated it? Because I know not everybody updates it</p> <p>7 regularly.</p> <p>8 A. I think it was about several weeks ago when I</p> <p>9 submitted my retirement or decided to retire.</p> <p>10 Q. Oh, when was that when you decided to retire?</p> <p>11 You said just a couple months ago; is that right?</p> <p>12 A. About a month ago.</p> <p>13 Q. About a month ago, all right. That was going</p> <p>14 to be one of my questions, so...</p> <p>15 All right. On Page 2 of Exhibit 1, it</p> <p>16 looks like the first work experience listed is about</p> <p>17 past midway down. It's deputy chief of in-custody</p> <p>18 detention services with Bexar County office, and it</p> <p>19 shows there a date of November '99 to December of 2016.</p> <p>20 Was Bexar County Sheriff's Office, were</p> <p>21 they your first law enforcement job?</p> <p>22 A. Yes.</p> <p>23 Q. Okay.</p> <p>24 What position did you enter as in 1999?</p> <p>25 What was your first position there?</p>

5 (Pages 14 - 17)

<p style="text-align: right;">Page 18</p> <p>1 A. I was hired on as a cadet. And then after 2 graduating the academy, was a detention officer. 3 Q. Okay. 4 What is the -- now, what positions -- how 5 do you advance up to where you got to the deputy chief 6 of in-custody detention services? You start off as a 7 cadet. And then what's -- what are the next steps to 8 get where you ultimately were? 9 A. So after cadet, it's a detention officer. And 10 through a promotional process or competitive promotional 11 process, it's corporal; and then sergeant; and then 12 lieutenant. And you can test and promote to captain. I 13 did not. And then the deputy chief position is 14 appointed by the sheriff. 15 Q. Okay. 16 MS. AYACHI: Counsel, I'm sorry to 17 interject. I just want to point out that on this 18 exhibit, there's a white square that's blocking some of 19 information, also, in my printed version. And then, 20 also, I just -- I see that the date has been stamped on 21 this document. I just don't see a URL at the bottom to 22 indicate the website from which it was pulled. But, 23 please, go ahead and continue asking your question. 24 MS. HARRIS: Yeah, I was going to mention 25 that white box. I noticed that last night as well, so I</p>	<p style="text-align: right;">Page 20</p> <p>1 July of 2014." 2 What is that position? 3 A. That is a position on the board of directors 4 for the Deputy Sheriff's Association, which is the labor 5 organization that represents the uniform staff in the 6 department. 7 Q. Is that a separate pay position, or is that 8 just part of Bexar County Sheriff's Office? 9 A. It's not a paid position. We run for office. 10 In the department, uniform staff can run for office and 11 are elected by the membership. 12 Q. Okay. 13 What are -- did you have any separate 14 duties with regard to that -- 15 A. Yes. 16 Q. -- position? 17 A. Yes. 18 Q. What were those? 19 A. Most of them were contract negotiations under 20 the collective bargaining agreement, contract 21 maintenance, reviewing employee grievances, day-to-day 22 operations of the union at the office, community 23 relations. 24 Q. Okay. Thank you. 25 And it looks like you left Bexar County</p>
<p style="text-align: right;">Page 19</p> <p>1 apologize for that. I did not realize that until it was 2 too late. But let's see. 3 Q. (BY MS. HARRIS) When did you reach the deputy 4 chief position with Bexar County Sheriff's Office? Do 5 you remember the year? 6 A. I believe it was in June of 2014. 7 Q. And then you held that position through when 8 you left in 2016? 9 A. Correct. 10 Q. All right. 11 Before you started with Bexar County 12 Sheriff Office, did you have any police academy or law 13 enforcement training you attended? 14 A. Before? 15 Q. Correct. Before -- I guess, before 1999. 16 A. No, ma'am. 17 Q. Okay. 18 And when you were a -- corporal, sergeant, 19 lieutenant, all of those -- were you still in detention 20 services? 21 A. Yes, ma'am. 22 Q. Okay. 23 And right underneath that job in your 24 LinkedIn profile, it shows (as read): "Director. 25 Deputy Association of Bexar County from October 2011 to</p>	<p style="text-align: right;">Page 21</p> <p>1 Sheriff's Office in 2016. 2 For what reason did you leave Bexar County 3 Sheriff's Office? 4 A. I was not reappointed to the position of deputy 5 chief by the newly incoming elected sheriff. 6 Q. Okay. 7 And then right above the deputy chief 8 position in your LinkedIn profile, it says (as read): 9 "Partner/auditor of the National PREA Auditing and 10 Consulting from June 2014 to the president {sic}." 11 PREA is Prison Rape Elimination Act; is 12 that correct? 13 A. Correct. 14 Q. All right. 15 Is this associated with the Sheriffs 16 Office, or is this a separate company? 17 A. This is separate. 18 Q. Okay. 19 Is it a personal business? 20 A. Correct. 21 Q. All right. 22 What do you do with the -- with -- as 23 partner/auditor of the National PREA Auditing and 24 Consulting? 25 A. I conduct preaudits for facilities around the</p>

<p style="text-align: right;">Page 22</p> <p>1 United States.</p> <p>2 Q. Actually, if you'll turn to exhibit -- or</p> <p>3 Tab 2, which I'm going to mark as Exhibit 2, that looks</p> <p>4 to be the LinkedIn profile for the National PREA</p> <p>5 Auditing and Consulting, LLC.</p> <p>6 If you'll take a glance at that and see if</p> <p>7 you agree that that looks like the LinkedIn profile.</p> <p>8 (Exhibit 2 marked.)</p> <p>9 A. That's correct.</p> <p>10 Q. All right.</p> <p>11 Is the overview, as it's written there, a</p> <p>12 pretty good explanation? Would you add anything to it?</p> <p>13 A. Correct.</p> <p>14 Q. All right.</p> <p>15 Does the National PREA Auditing and</p> <p>16 Consulting have any other employees other than yourself?</p> <p>17 A. Monica Lugo.</p> <p>18 Q. Okay.</p> <p>19 And what is her role?</p> <p>20 A. She's also an auditor and a partner.</p> <p>21 Q. And she's been with you since 2014?</p> <p>22 A. Correct.</p> <p>23 Q. And are y'all still able to do this business,</p> <p>24 or have you slowed down since you retired?</p> <p>25 A. Slowed down significantly.</p>	<p style="text-align: right;">Page 24</p> <p>1 Q. Oh, throughout the United States, okay.</p> <p>2 Have you provided any expert review through</p> <p>3 this LLC of cases and incidents for purposes of</p> <p>4 litigation?</p> <p>5 A. No.</p> <p>6 Q. Okay.</p> <p>7 Have you provided any expert testimony</p> <p>8 through this organization -- through this LLC for any</p> <p>9 organization?</p> <p>10 A. No.</p> <p>11 Q. All right. All right.</p> <p>12 Do y'all draft and review policies for</p> <p>13 county jails as well as the auditing and consulting?</p> <p>14 A. Yes.</p> <p>15 Q. Okay.</p> <p>16 About how many -- do you do that with all</p> <p>17 of your audits, or is it only -- is it separate from the</p> <p>18 auditing business?</p> <p>19 A. Well, as part of the audit process, there's a</p> <p>20 review of policies. But at -- at times, other</p> <p>21 facilities have asked for, you know, a review of --</p> <p>22 either a review of policy or a review of the handbook as</p> <p>23 part of the national preauditing and consulting.</p> <p>24 Q. Okay.</p> <p>25 Well, I'm going to switch back to Exhibit 1</p>
<p style="text-align: right;">Page 23</p> <p>1 Q. But y'all still do things here and there as far</p> <p>2 as audits?</p> <p>3 A. No. Actually, we stopped auditing.</p> <p>4 Q. Okay.</p> <p>5 What -- do you just consult now basically?</p> <p>6 A. I haven't, but that would be something that I</p> <p>7 would be open to.</p> <p>8 Q. Okay.</p> <p>9 And the sheriff's offices, Bexar County and</p> <p>10 Tarrant County, they don't mind you doing this while</p> <p>11 employed with them, correct?</p> <p>12 A. Correct.</p> <p>13 Q. All right.</p> <p>14 For what kind of organizations did you</p> <p>15 provide auditing services through this LLC?</p> <p>16 A. Largely, county jails.</p> <p>17 Q. About how many auditing services have you -- I</p> <p>18 guess, how many times have you provided auditing</p> <p>19 services to county jails? Is it quite a few?</p> <p>20 A. Probably about -- maybe 10 to 15.</p> <p>21 Q. Okay.</p> <p>22 All over the state of Texas or mainly in</p> <p>23 Bexar County area?</p> <p>24 A. They've been a -- different facilities</p> <p>25 throughout the United States.</p>	<p style="text-align: right;">Page 25</p> <p>1 again -- or Tab 1.</p> <p>2 And on Page 2 at the top that is partly</p> <p>3 covered by the box, I'm going to represent to you what I</p> <p>4 think it says. That you are -- were chief deputy of</p> <p>5 housing, assistant jail administrator for Tarrant County</p> <p>6 Sheriff's Office from August 2017 to present.</p> <p>7 Does that sound like your correct position?</p> <p>8 A. Correct.</p> <p>9 Q. Okay.</p> <p>10 And you retired, you said about a month</p> <p>11 ago; is that correct?</p> <p>12 A. My retirement's officially effective September</p> <p>13 22nd.</p> <p>14 Q. Oh, okay. Congratulations on retirement.</p> <p>15 Are there any other law enforcement</p> <p>16 positions you've held other than these that we've gone</p> <p>17 through right now?</p> <p>18 A. No, ma'am.</p> <p>19 Q. All right.</p> <p>20 And it looks like pretty much all of your</p> <p>21 law enforcement experience has been in -- in detention</p> <p>22 services.</p> <p>23 Would that be accurate?</p> <p>24 A. Yes.</p> <p>25 Q. Okay.</p>

<p style="text-align: right;">Page 26</p> <p>1 And have you done anything with regard to</p> <p>2 crime investigation in law enforcement?</p> <p>3 A. What do you mean by "anything"?</p> <p>4 Q. I guess -- I guess, other than in your role in</p> <p>5 detention services, have you done separately any work</p> <p>6 with Criminal Investigation Division? Or is that a hard</p> <p>7 question to answer? If so, let me know why.</p> <p>8 A. It is. I mean, it is.</p> <p>9 So I don't understand if you're asking,</p> <p>10 like, if I worked in a CID or criminal investigation</p> <p>11 capacity or if I've performed tasks that have maybe</p> <p>12 helped augment an ongoing investigation by the Criminal</p> <p>13 Investigation Division.</p> <p>14 Q. Okay.</p> <p>15 How about as far as conducting criminal</p> <p>16 investigations as part of the Criminal Investigation</p> <p>17 Division?</p> <p>18 A. I have not.</p> <p>19 Q. Okay.</p> <p>20 But I understand through your work in</p> <p>21 detention services, you would have helped criminal</p> <p>22 investigations within an investigation; is that correct?</p> <p>23 Is that fair to say?</p> <p>24 A. Yes, ma'am.</p> <p>25 Q. All right.</p>	<p style="text-align: right;">Page 28</p> <p>1 is that correct?</p> <p>2 A. Correct.</p> <p>3 Q. Were you working at the Bexar County Sheriff's</p> <p>4 Office while going to school?</p> <p>5 A. Yes, ma'am.</p> <p>6 Q. Did you go, like, nights or weekends or</p> <p>7 something?</p> <p>8 A. Evenings, weekends.</p> <p>9 Q. Okay.</p> <p>10 All right. Then you went to Columbia</p> <p>11 Southern University from 2007 to 2009.</p> <p>12 A. Correct.</p> <p>13 Q. Is that online, or is that -- or did you</p> <p>14 actually get to go to Alabama?</p> <p>15 A. I went online.</p> <p>16 Q. All right.</p> <p>17 And you got a BS in criminal justice</p> <p>18 administration; is that right?</p> <p>19 A. Right.</p> <p>20 Q. All right.</p> <p>21 Then from 2010 to 2012, it looks like you</p> <p>22 attended Wayland Baptist University.</p> <p>23 Did you go up to Plainview for that one in</p> <p>24 my neck of the woods, or did you -- do they have a</p> <p>25 campus in San Antonio?</p>
<p style="text-align: right;">Page 27</p> <p>1 If you could turn to Tab 3, which is --</p> <p>2 which I am going to mark as Exhibit 3. It looks like</p> <p>3 that is your education as listed on LinkedIn.</p> <p>4 Does that look accurate to you?</p> <p>5 (Exhibit 3 marked.)</p> <p>6 A. Yes.</p> <p>7 Q. (BY MS. HARRIS) All right. There's a lot. So</p> <p>8 we're just going to go through it briefly.</p> <p>9 MS. AYACHI: And I'd just like to place an</p> <p>10 objection again. The URL is not visible on here and the</p> <p>11 date is as well as on Exhibit 2.</p> <p>12 And for any other web pages that you want</p> <p>13 to have that don't have the URL, I'll just have an</p> <p>14 standing objection, okay?</p> <p>15 MS. HARRIS: Okay.</p> <p>16 Q. (BY MS. HARRIS) What year did you graduate</p> <p>17 from high school?</p> <p>18 A. In 1999.</p> <p>19 Q. Okay.</p> <p>20 At the bottom of the first page, it looks</p> <p>21 like you first attended Northwest Vista College.</p> <p>22 Is that in San Antonio?</p> <p>23 A. Yes, ma'am.</p> <p>24 Q. All right. From 2006 to 2007.</p> <p>25 And you got an associate's degree in math;</p>	<p style="text-align: right;">Page 29</p> <p>1 A. They had a campus in San Antonio and then also</p> <p>2 an online program.</p> <p>3 Q. I did not realize that. I just knew there was</p> <p>4 one up in Plainview. I grew up Muleshoe up in the</p> <p>5 Panhandle. So I just knew there was a Wayland in</p> <p>6 Plainview. I didn't know they expanded, so good for</p> <p>7 them.</p> <p>8 So you got a master in public</p> <p>9 administration and justice administration; is that</p> <p>10 correct?</p> <p>11 A. Correct.</p> <p>12 Q. All right. All right.</p> <p>13 And then last, there is Abilene Christian</p> <p>14 University from 2017 to June 2023.</p> <p>15 That looks like you were at Tarrant County</p> <p>16 Sheriff's Office at the time you went to Abilene</p> <p>17 Christian; is that right?</p> <p>18 A. Right.</p> <p>19 Q. All right.</p> <p>20 Did you drive back and forth to Abilene, or</p> <p>21 do they have an online program as well?</p> <p>22 A. They also have an online program.</p> <p>23 Q. All right.</p> <p>24 And it looks like you got your doctorate</p> <p>25 degree there; is that right?</p>

<p style="text-align: right;">Page 30</p> <p>1 A. I'm on my dissertation, so I'm working on my 2 dissertation now.</p> <p>3 Q. Was the sheriff's office able to help you out 4 with any of your education and degrees?</p> <p>5 MS. AYACHI: Objection, form.</p> <p>6 Q. (BY MS. HARRIS) As providing any scholarships? 7 Payments anything like that?</p> <p>8 A. Tarrant County Sheriff's office.</p> <p>9 Q. Or Bexar County for the others in -- the other 10 schools.</p> <p>11 A. Tarrant County, no; Bexar County, yes.</p> <p>12 Q. Okay.</p> <p>13 Did you receive any other -- I know there 14 are licenses and certifications but any other college or 15 formal education that is not listed here?</p> <p>16 A. My peace officer license that I -- that I did 17 through the San Antonio Law Enforcement Academy.</p> <p>18 Q. Okay.</p> <p>19 When was that?</p> <p>20 A. Oh, wow. 2002.</p> <p>21 Q. And then if you'll -- let's see. I guess, at 22 the bottom of the first page, it says (as read): "You 23 attended a jail administration management and operations 24 training program at Sam Houston State University in 25 2014." It says that was a week-long program.</p>	<p style="text-align: right;">Page 32</p> <p>1 team audit?</p> <p>2 A. Yes.</p> <p>3 Q. Who selected you for this?</p> <p>4 A. I believe it was either NIC or the jail 5 administrator from Bexar County at the time.</p> <p>6 Q. Okay.</p> <p>7 How many people were on the team?</p> <p>8 A. Total on the team -- oh, wow. Somewhere in the 9 neighborhood of maybe 20, 25.</p> <p>10 Q. Oh, quite a few people.</p> <p>11 A. Right.</p> <p>12 Q. Okay.</p> <p>13 Was there a presentation -- it looks like 14 there was a presentation there. "High Liability Inmates 15 at Large Jail Network" -- at Large Jail Network."</p> <p>16 Is that part of the team, or is that 17 something different?</p> <p>18 A. That was a -- that was a separate program.</p> <p>19 Q. Were you a presenter on that one?</p> <p>20 A. Correct.</p> <p>21 Q. All right.</p> <p>22 What is a high-liability inmate?</p> <p>23 A. So for purposes of this presentation, a 24 high-liability inmate was -- was basically our inmates 25 who require a higher level of care, maybe a higher level</p>
<p style="text-align: right;">Page 31</p> <p>1 Did Bexar County send you to that program?</p> <p>2 A. Yes, ma'am.</p> <p>3 Q. Did any of this training concern substance 4 abuse or drug abuse?</p> <p>5 MS. AYACHI: Objection, form.</p> <p>6 A. Can you explain the question or expand on it?</p> <p>7 Q. (BY MS. HARRIS) Did any of this training 8 concern opioids?</p> <p>9 A. Not that I can recall.</p> <p>10 Q. Okay.</p> <p>11 It says -- then it looks like you 12 participated in a team audit of the Los Angeles County 13 Jail System for the National Institute of Corrections, 14 and that's from 2015 to 2016.</p> <p>15 What was that?</p> <p>16 A. The National Institute of Corrections, or NIC, 17 gathered a team of county jail professionals from around 18 the nation. And we went to conduct a security audit of 19 the Los Angeles County Jail System where we audited 20 their practices, their facility.</p> <p>21 I believe we reviewed some of their 22 policies and then conducted an out brief to the 23 director, I believe. Her name's Terri McDonald. I 24 don't know if she's still in the position anymore.</p> <p>25 Q. Were you selected to go with -- to be on this</p>	<p style="text-align: right;">Page 33</p> <p>1 of observation or whose presence in the jail represents 2 an increased risk for either self-harm or experiencing 3 any type of medical and mental health emergency.</p> <p>4 Q. Did any of that presentation concern substance 5 abuse or opioids?</p> <p>6 A. Yes.</p> <p>7 Q. To what extent?</p> <p>8 A. We discussed -- or I discussed the housing of 9 inmates who are under detox protocols.</p> <p>10 Q. What did you discuss about them? Was there 11 something that's particular -- that's an issue?</p> <p>12 MS. AYACHI: Objection, form.</p> <p>13 A. Basically, just the practice of housing them 14 together and kind of working with medical and mental 15 health to identify their locations and -- their housing 16 locations. And in a nutshell, the presentation was on 17 housing -- housing of inmates to basically get maximum 18 use of your available beds in the jail.</p> <p>19 Q. (BY MS. HARRIS) If you'll turn the page, it 20 looks like the next attendance is the National Jail 21 Leadership Command Academy at Sam Houston State 22 University in 2018.</p> <p>23 How long was that academy, if you remember?</p> <p>24 A. I believe it was a week.</p> <p>25 Q. Was that one while you were at Tarrant County</p>

<p style="text-align: right;">Page 34</p> <p>1 Sheriff's Office?</p> <p>2 A. Yes, ma'am.</p> <p>3 Q. All right.</p> <p>4 Did they send you to that, or was that</p> <p>5 something you wanted to do on your own?</p> <p>6 A. I applied, was selected, and the department</p> <p>7 sent me.</p> <p>8 Q. Okay. Great.</p> <p>9 Did any of that program discuss opioids?</p> <p>10 A. Not that I can recall.</p> <p>11 Q. Okay.</p> <p>12 All right. Do you remember if it discussed</p> <p>13 substance abuse in general?</p> <p>14 A. No, ma'am, I don't recall.</p> <p>15 Q. Okay. All right.</p> <p>16 The next one on the list is the FBI</p> <p>17 National Academy in 2020, and it looks like that was a</p> <p>18 ten-week program.</p> <p>19 How did you come to attend that one?</p> <p>20 A. I applied to the National Academy, was</p> <p>21 selected, and was sent by Tarrant County.</p> <p>22 Q. Did you get some kind of a degree or</p> <p>23 certificate or some other kind of accreditation for</p> <p>24 completing?</p> <p>25 A. It's a certificate with graduate hours, but not</p>	<p style="text-align: right;">Page 36</p> <p>1 about controlled substances in general?</p> <p>2 A. No, ma'am.</p> <p>3 Q. All right.</p> <p>4 It looks like the last one is the National</p> <p>5 Institute for Jail Operations Elite Program Corrections</p> <p>6 Administration in February 2022.</p> <p>7 What was that program?</p> <p>8 A. That is a leadership development program that's</p> <p>9 put on by the National Institute for Jail Operations.</p> <p>10 It was their first program -- their first time running</p> <p>11 the program -- their elite program, and it covers topics</p> <p>12 related to leadership and -- for jail leaders, jail</p> <p>13 professionals.</p> <p>14 Q. In that program, did you receive any education</p> <p>15 about opioids?</p> <p>16 A. No, ma'am.</p> <p>17 Q. All right.</p> <p>18 Do you recall in that program if you</p> <p>19 received any education about controlled substances in</p> <p>20 general?</p> <p>21 A. No, ma'am.</p> <p>22 Q. And if you'll turn to exhibit -- or Tab 4,</p> <p>23 which I'm going to mark as Exhibit 4. It looks like</p> <p>24 there is a list of licenses and certifications.</p> <p>25 Do those look correct to you? And are</p>
<p style="text-align: right;">Page 35</p> <p>1 enough to equate to a master's degree. So it's a</p> <p>2 certificate.</p> <p>3 Q. Okay.</p> <p>4 What kind of education did you get at that</p> <p>5 academy?</p> <p>6 MS. AYACHI: Objection, form.</p> <p>7 Q. (BY MS. HARRIS) What topics did you discuss</p> <p>8 there?</p> <p>9 A. Oh, I'm sorry.</p> <p>10 Largely, it was leadership. So there were</p> <p>11 leadership topics, mental health wellness for staff,</p> <p>12 physical wellness, current trends, policing Internet.</p> <p>13 They talked about different policing practices from</p> <p>14 around the world. Basically introducing us to different</p> <p>15 cultures from police departments around the world.</p> <p>16 Q. Did you receive any -- oh, I'm so sorry. I</p> <p>17 didn't mean to interrupt you.</p> <p>18 A. Media relations, communication, public</p> <p>19 speaking.</p> <p>20 Q. Did you receive any education about narcotics?</p> <p>21 A. Not that I can recall.</p> <p>22 Q. Any education there about opioids or</p> <p>23 prescription opioids?</p> <p>24 A. No, ma'am.</p> <p>25 Q. Do you remember receiving any education there</p>	<p style="text-align: right;">Page 37</p> <p>1 there any you would add?</p> <p>2 (Exhibit 4 marked.)</p> <p>3 A. The list is correct.</p> <p>4 Q. (BY MS. HARRIS) Okay.</p> <p>5 For these licenses and certifications,</p> <p>6 generally, like for the first one, National Certified</p> <p>7 Corrections Executive, what did you -- what were you</p> <p>8 required to do to get this certification?</p> <p>9 A. You first have to apply for the -- you have to</p> <p>10 apply to the organization to demonstrate either specific</p> <p>11 years in a position at a certain rank or a certain</p> <p>12 level, and then you have to complete a specified number</p> <p>13 of hours of training and submit them to the organization</p> <p>14 for review. And for this specific certification, they</p> <p>15 make the determination whether you would qualify for the</p> <p>16 certification or not.</p> <p>17 Excuse me. For others, they may review</p> <p>18 everything submitted and determine whether you're</p> <p>19 eligible to sit for an examination, an initial</p> <p>20 examination for certification.</p> <p>21 Q. And for the ACA auditor, is that a licensing,</p> <p>22 I'm guessing?</p> <p>23 A. I guess it's more -- it's more of -- yeah, it's</p> <p>24 a license. That makes sense.</p> <p>25 Q. What were you required to do for that license?</p>

<p style="text-align: right;">Page 38</p> <p>1 A. Submit an application to American Correctional 2 Association to demonstrate years of experience in both 3 the -- in both in corrections and as an auditor or 4 auditing experience. 5 Q. Okay. 6 What about for the Certified Corrections 7 Executive? For that certification, what were you 8 required to do? 9 A. Submit an application demonstrating years of 10 experience in a specific position at a specific rank, 11 submit training, and then sit for examination. 12 Q. Same question for Advanced Police Instructor. 13 A. The Advanced Police Instructor, it's the second 14 part of an instructor certification. The first part is 15 your Basic Instructor Certification through TCOLE, the 16 Texas Commission on Law Enforcement. And you have to 17 complete the Basic Instructor course. 18 And then after holding certification as an 19 instructor for, I believe it's -- I believe it's three 20 years, then you can apply to become -- to be certified 21 as an advanced instructor and then complete an -- 22 additional coursework for the Advanced Police Instructor 23 Certification. 24 Q. All right. 25 So the next one, the Certified Corrections</p>	<p style="text-align: right;">Page 40</p> <p>1 A. So Master Jailer Certification is the -- if you 2 will, the highest level of jail certification that you 3 can receive through the Texas Commission on Law 4 Enforcement as a jailer. You have to first be certified 5 as a basic jailer; and then three years' of experience, 6 and training points, education, and completing certain 7 courses that TCOLE outlines. You can achieve the 8 different levels. It's basic, intermediate, advanced, 9 and then master. 10 Q. And, similarly, the Master Peace Officer 11 license. 12 Is that somewhat similar? 13 A. Correct. 14 Q. Okay. 15 And then the last one, the PREA Auditor for 16 jails and prisons. 17 What did you need to do to get that 18 license? 19 A. To be certified as a preauditor, I attended the 20 preauditor training in South Carolina. And I can't 21 remember if it was one week or two weeks. It was in -- 22 wow -- 2014. 23 Attended a program there that was put on 24 through, I believe, the Department of Justice. And then 25 at the end of the program, you have to sit for an</p>
<p style="text-align: right;">Page 39</p> <p>1 Executive, is that similar to the first one, the 2 National Corrections Executive? 3 A. Correct. It's a repeat. 4 Q. All right. 5 What about for Certified Jail Manager? 6 What were you required to do for that? 7 A. For the Certified Jail Manager, once again, 8 submitting application, on this one, it's to the 9 American Jail Association, demonstrating years of 10 experience in a specific position at a certain rank. 11 And then submit a proof of training for a specified 12 number of hours. I don't recall the number of hours. 13 And then, I believe, for the Certified Jail 14 Manager, or CJM, you also have to set for an examination 15 for your initial certification. 16 Q. For the next one, what is a Fusion Liaison 17 officer? 18 A. Fusion Liaison was a -- was a duty with the 19 Southwest Texas Fusion Center that I held in and 20 training completed when I was -- I believe I was a 21 sergeant at the time that dealt with specifically gang 22 intelligence. 23 Q. What about the next one? Master Jailer's 24 Certification? What did you have to do to get that 25 certification?</p>	<p style="text-align: right;">Page 41</p> <p>1 examination that's graded by a panel. And then they 2 notify you whether you pass or failed. 3 Q. Now, I'm going to switch topics now a little 4 bit. 5 If you can, explain to me a little bit how 6 the Tarrant County Sheriff's Office is structured. 7 What is the next level below the sheriff? 8 And then kind of go down a little bit if it's possible. 9 A. Okay. 10 Q. Uh-huh. 11 A. Below the sheriff is the senior chief deputy, 12 who's generally designated by wearing three stars on his 13 collar. 14 Q. Okay. 15 A. Under him or beside him, depending on how it's 16 set up, is the chief of staff, who in this agency, is 17 designated by wearing two stars. 18 On the detention side, you have the 19 executive chief deputy, who serves as the jail 20 administrator. He's designated by wearing two stars. 21 And under him, you have two assistant jail 22 administrations, who also hold the rank of deputy, but 23 are designated by wearing one stars. 24 On the operations side, or the law 25 enforcement side, you'll have chief deputies overseeing</p>

<p style="text-align: right;">Page 42</p> <p>1 different divisions of the department. For example, 2 we'll have a chief deputy over patrol, who's a one star; 3 a chief deputy over judicial services, or the 4 courthouse, is the two star; chief deputy over CID, 5 who's a one star. A chief deputy over -- what else do 6 we have? Inmate services, which is like jail 7 programming and deals with the volunteers; and then a 8 chief deputy over our intel section. 9 Without looking at an organizational chart, 10 it's kind of hard to picture, but... 11 Q. Well -- and I think I have one. Let me reach 12 in and look at it real quick. 13 Switch to Exhibit 5, or Tab 5, which I'm 14 going to mark as Exhibit 5. And I think -- the last 15 page of that exhibit, it has names, but not really what 16 their position is or what their area of focus is, if 17 that helps. 18 (Exhibit 5 marked.) 19 A. Okay. 20 Q. (BY MS. HARRIS) So Senior Chief Mike Simonds, 21 what was his area of focus? 22 A. He -- I mean, he provided direction and 23 guidance essentially for all divisions in the sheriff's 24 office from the jail to the operation site. 25 Q. You have the chief of staff.</p>	<p style="text-align: right;">Page 44</p> <p>1 A. He was in charge of CID. 2 Q. Chief Tim Canas? 3 A. He was in charge of patrol operation. 4 Q. And then there's Chief Charles Eckert? 5 A. He was another -- he was the second jail 6 administrator at the time. 7 Q. And at this time, were you still -- were you 8 chief deputy of housing assistant jail administration; 9 is that correct? 10 A. Correct. 11 Just -- just to clarify, Chief Eckert, he 12 was one of the other assistant jail administrators in 13 the jail, but he was in charge of our support services 14 in the jail. 15 Q. And so for this, both you and Chief Eckert 16 would report to Executive Chief Cundiff, is that -- am I 17 reading that correctly? 18 A. Correct. 19 Q. And then Chief Cundiff reports to Senior Chief 20 Mike Simonds? 21 A. Correct. 22 Q. All right. 23 With your specific work experience and 24 Tarrant County, in particular, do you believe you are 25 knowledgeable to speak of the role and maybe the impact</p>
<p style="text-align: right;">Page 43</p> <p>1 Then Executive Chief Craig Driskell. 2 What was his title? 3 A. At this -- he was a chief deputy. So at -- 4 during this -- when this photo {sic}, he was over 5 training. Training judicial, which is the courts. And, 6 I believe -- and then that's it. Those two areas from 7 what I can recall. 8 Q. Anyone -- let's just flip back to the first or 9 the second page of this exhibit. And I'll tell you, I 10 think, this is a 2018 -- or the third page, sorry -- of 11 this tab. 12 It's talking about 2018 stats in Sheriff 13 Waybourn's article on Page 3. So I think this is either 14 a 2018 or 2019 report, if that helps. 15 A. Okay. 16 Q. All right. Sorry. Getting back to the last 17 page. 18 Executive Chief Randy Cundiff. What was 19 his title or area of focus? 20 A. At this time, he was a jail administrator. 21 Q. Chief Roy Kurban? 22 A. He was in charge of inmate services. 23 Q. And Chief Steven Sparks? 24 A. He was in charge of internal affairs and IT. 25 Q. And Chief Vennum. Jerry Vennum?</p>	<p style="text-align: right;">Page 45</p> <p>1 of opioids in general and prescription opioids, the 2 effect that they have had in Tarrant County? 3 A. Hold on. The -- I want to make sure that I 4 don't close anything out that I'm not supposed to. The 5 -- 6 Q. Okay. 7 A. -- message popped up on the computer screen. 8 Q. Oh. 9 A. Can you repeat -- 10 Q. Yeah, I'll restate. 11 A. Can you repeat the question? 12 Q. Yeah. 13 With your specific experience in Tarrant 14 County, do you believe you are knowledgeable to speak to 15 the role and the impact that opioids in general and 16 prescription opioids, specifically, the effect they have 17 had in Tarrant County? 18 MS. AYACHI: Objection, form. 19 A. In Tarrant -- no. Not in Tarrant County. 20 Q. (BY MS. HARRIS) Do you have -- excuse me -- 21 any knowledge regarding the laws and regulations of a 22 pharmacy in filling and dispensing a medical 23 prescription? 24 MS. AYACHI: Objection, form. 25 A. No.</p>

<p style="text-align: right;">Page 46</p> <p>1 Q. (BY MS. HARRIS) Do you have any understanding</p> <p>2 that chain pharmacies in Tarrant County do not</p> <p>3 manufacture prescription opioid medications?</p> <p>4 MS. AYACHI: Objection, form.</p> <p>5 A. No.</p> <p>6 Q. (BY MS. HARRIS) Do you have an understanding</p> <p>7 that chain pharmacies in Tarrant County do not write</p> <p>8 prescriptions for opioid medications?</p> <p>9 MS. AYACHI: Objection, form.</p> <p>10 A. No.</p> <p>11 Q. (BY MS. HARRIS) Do you have any understanding</p> <p>12 that only healthcare providers licensed by the DEA can</p> <p>13 write prescriptions for opioids?</p> <p>14 MS. AYACHI: Objection, form.</p> <p>15 A. No.</p> <p>16 Q. (BY MS. HARRIS) Okay.</p> <p>17 Do you have any information that any chain</p> <p>18 pharmacy in Tarrant County has been the cause of any</p> <p>19 opioid abuse or addiction?</p> <p>20 MS. AYACHI: Objection, form.</p> <p>21 A. No.</p> <p>22 Q. (BY MS. HARRIS) And I think -- I don't think</p> <p>23 we've discussed this, but do you have -- have you heard</p> <p>24 of the term "diversion" as it relates to opioids?</p> <p>25 A. Can you define it?</p>	<p style="text-align: right;">Page 48</p> <p>1 operations and CID, and that's not something I generally</p> <p>2 track. All the information that I track or any</p> <p>3 incidents I track are in the jail.</p> <p>4 Q. (BY MS. HARRIS) And with regard to the</p> <p>5 detention services, what causes you the most problems, I</p> <p>6 guess, with related to substance abuse?</p> <p>7 MS. AYACHI: Objection, form.</p> <p>8 A. It's the introduction of substances into the</p> <p>9 jail from outside through different means.</p> <p>10 Q. (BY MS. HARRIS) What are the main substances</p> <p>11 that are snuck in, I guess, without a better way to say</p> <p>12 it?</p> <p>13 A. What we suspect is fentanyl, but we just -- we</p> <p>14 just suspect that anything coming in could contain or</p> <p>15 might be fentanyl. But until they run lab tests, we</p> <p>16 don't know definitively what it is.</p> <p>17 Q. Do you believe Tarrant County has an opioid</p> <p>18 crisis?</p> <p>19 MS. AYACHI: Objection, form.</p> <p>20 A. I don't know.</p> <p>21 Q. (BY MS. HARRIS) Have you ever been prescribed</p> <p>22 a prescription opioid?</p> <p>23 MS. AYACHI: I'm going to object and</p> <p>24 instruct the witness not to answer on the grounds of</p> <p>25 HIPAA-protected information.</p>
<p style="text-align: right;">Page 47</p> <p>1 Q. Yeah, that's what I was going to say.</p> <p>2 Do you have an understanding about what the</p> <p>3 word "diversion" means as it relates to opioids?</p> <p>4 A. No.</p> <p>5 Q. Okay.</p> <p>6 Do you have any knowledge of any grant</p> <p>7 applications by Tarrant County or grants awarded to</p> <p>8 Tarrant County related to opioids?</p> <p>9 A. No.</p> <p>10 MS. AYACHI: Objection, form.</p> <p>11 Q. (BY MS. HARRIS) All right.</p> <p>12 In your opinion, is there a substance abuse</p> <p>13 medical crisis in Tarrant County?</p> <p>14 MS. AYACHI: Objection, form.</p> <p>15 A. From the information that I've received from</p> <p>16 other command staff members and minus any, yes, there is</p> <p>17 a problem.</p> <p>18 Q. (BY MS. HARRIS) In what kind of forms do you</p> <p>19 see a problem? Is it alcohol? Marijuana? Illegal</p> <p>20 drugs? Fentanyl? What do you think is the main problem</p> <p>21 in Tarrant County?</p> <p>22 MS. AYACHI: Objection, form.</p> <p>23 A. I don't know if I'd be able to identify</p> <p>24 anything as a main problem in Tarrant County in the</p> <p>25 community just because that would fall under like the</p>	<p style="text-align: right;">Page 49</p> <p>1 MS. HARRIS: Okay.</p> <p>2 Q. (BY MS. HARRIS) Have you personally</p> <p>3 experienced anyone be it a family, friend, acquaintance</p> <p>4 that has been impacted by an addiction to a prescription</p> <p>5 opioid?</p> <p>6 MS. AYACHI: Objection, form.</p> <p>7 A. No.</p> <p>8 Q. (BY MS. HARRIS) Okay.</p> <p>9 A. Not that I know of.</p> <p>10 Q. Okay.</p> <p>11 Have you ever been Kroger to grocery shop?</p> <p>12 A. Ever in my life?</p> <p>13 Q. Ever in your life, have you been to Kroger to</p> <p>14 grocery shop that you recall?</p> <p>15 A. I'm sure when I was a kid. Once. Maybe twice.</p> <p>16 Q. Do you go there to get your prescriptions</p> <p>17 filled at all?</p> <p>18 A. No, ma'am.</p> <p>19 Q. Have you had any experiences good or bad at</p> <p>20 Kroger that you remember?</p> <p>21 A. No, ma'am.</p> <p>22 Q. Do you have an opinion about how substance</p> <p>23 abuse has impacted Tarrant County?</p> <p>24 A. Sure. Yeah, yes.</p> <p>25 Q. What is your opinion? What do you think?</p>

<p style="text-align: right;">Page 50</p> <p>1 A. Well, I think with all substance abuse, I think</p> <p>2 it can break up families, and it leads to individuals</p> <p>3 engaging in other criminal activity either to obtain the</p> <p>4 substances or to support their habit.</p> <p>5 Q. Do you have a particular substance that you</p> <p>6 find to be most abused?</p> <p>7 MS. AYACHI: Objection, form.</p> <p>8 A. No.</p> <p>9 Q. (BY MS. HARRIS) Do you have an opinion</p> <p>10 about --</p> <p>11 A. Excuse me.</p> <p>12 Q. Oh.</p> <p>13 A. I'm sorry.</p> <p>14 Q. Bless you.</p> <p>15 A. Can you repeat the question?</p> <p>16 Q. Sure.</p> <p>17 Do you have an opinion whether the majority</p> <p>18 of substance use and abuse is related to illegal</p> <p>19 substances?</p> <p>20 A. No, I don't have an opinion on that neither.</p> <p>21 Q. Have you noticed any changes in the trends of</p> <p>22 substance use through the -- through your years at</p> <p>23 Tarrant County Sheriff's Office?</p> <p>24 A. No.</p> <p>25 But I started Tarrant County in 2017. So I</p>	<p style="text-align: right;">Page 52</p> <p>1 that are provided to inmates. I believe this is</p> <p>2 submitted to, like I said, Texas Commission on Jail</p> <p>3 Standards.</p> <p>4 Q. All right.</p> <p>5 I'm looking at the first two sentences of</p> <p>6 the first paragraph on the first page under Health</p> <p>7 Services, and it reads (as read): "Medical and dental</p> <p>8 services shall be provided to the Tarrant County jail</p> <p>9 units by the Tarrant County Hospital District."</p> <p>10 Do you know -- what is the Tarrant County</p> <p>11 Hospital District? Do you have an understanding?</p> <p>12 A. I believe it's JPS. The JPS Hospital.</p> <p>13 Q. That was going to be my next question.</p> <p>14 Do you understand that to be the same as</p> <p>15 JPS Health Network, JPS Hospital?</p> <p>16 A. Yes.</p> <p>17 Q. And, correct me if I'm wrong, but it looks like</p> <p>18 the Tarrant County Hospital District, JPS, provides</p> <p>19 health services to Tarrant County families; is that your</p> <p>20 understanding?</p> <p>21 A. Yes.</p> <p>22 Q. Or Tarrant County Hospital District.</p> <p>23 And it looks like, if you read on -- if you</p> <p>24 read that sentence (as read): "Medical and dental</p> <p>25 services shall be provided for the Tarrant County jail</p>
<p style="text-align: right;">Page 51</p> <p>1 don't have two decades of experience here to see -- to</p> <p>2 see the changes, if any.</p> <p>3 Q. Okay.</p> <p>4 If a prescription opioid is diverted and</p> <p>5 seized, do you and law enforcement consider that to be</p> <p>6 an illicit drug?</p> <p>7 MS. AYACHI: Objection, form.</p> <p>8 A. I don't know. I don't know how the CID section</p> <p>9 or portion of the investigation, how that works, and</p> <p>10 what their criteria is.</p> <p>11 Q. (BY MS. HARRIS) Okay. All right.</p> <p>12 Let's look at Tab 6, which I'll mark as</p> <p>13 Exhibit 6. This document is entitled, Tarrant County</p> <p>14 Sheriff's Department Health Services Plan, and it looks</p> <p>15 like it's date-stamped March 7th, 2022.</p> <p>16 Is this a document you remember seeing?</p> <p>17 (Exhibit 6 marked.)</p> <p>18 A. Yes.</p> <p>19 Q. (BY MS. HARRIS) In general, can you tell me</p> <p>20 what it is?</p> <p>21 A. I believe this is the health services plan</p> <p>22 that's submitted to the Texas Commission on Jail</p> <p>23 Standards outlining the medical and, I believe, mental</p> <p>24 health services; and treatment that's submitted --</p> <p>25 outlined -- the treatment that's provided or services</p>	<p style="text-align: right;">Page 53</p> <p>1 units by the Tarrant County Hospital District." And</p> <p>2 then if you, kind of, jump down three or four lines, it</p> <p>3 says (as read): "In conjunction with the Tarrant County</p> <p>4 Mental Health Mental Retardation"?</p> <p>5 A. Yes.</p> <p>6 Q. People commonly refer to that as "MHMR,"; is</p> <p>7 that right?</p> <p>8 A. Correct.</p> <p>9 Q. And I think several years ago, MHMR changed</p> <p>10 their name from Mental Health Mental Retardation to My</p> <p>11 Health My Resources?</p> <p>12 A. That's correct.</p> <p>13 Q. Do you know -- okay. That's correct, okay.</p> <p>14 Do you know how the Tarrant County Hospital</p> <p>15 District and the Tarrant County MHMR coordinate their</p> <p>16 services to provide medical care in the Tarrant County</p> <p>17 jail units?</p> <p>18 MS. AYACHI: Objection, form.</p> <p>19 A. Can you repeat the question?</p> <p>20 Q. (BY MS. HARRIS) Sure.</p> <p>21 Do you know how -- do you know how the</p> <p>22 Tarrant County Hospital District and the Tarrant County</p> <p>23 MHMR coordinate their services to provide medical care</p> <p>24 in the Tarrant County jail units?</p> <p>25 MS. AYACHI: Objection, form.</p>

<p style="text-align: right;">Page 54</p> <p>1 A. Yes.</p> <p>2 Q. (BY MS. HARRIS) Okay.</p> <p>3 Who does what? How does it work?</p> <p>4 A. So JPS, or the medical provider in the jail,</p> <p>5 which I'll refer to as "JPS," has directors, if you</p> <p>6 will, executive directors, medical directors. And MHMR</p> <p>7 also has a director.</p> <p>8 And they communicate with each other on</p> <p>9 either specific cases or on situations that might</p> <p>10 require a procedural change or an operational change.</p> <p>11 And I believe they meet jointly -- not just them, but</p> <p>12 other MHMR or JPS employees -- meet at least once a week</p> <p>13 to discuss either specific cases or just medical mental</p> <p>14 health services in general.</p> <p>15 Q. In that first paragraph, right above the line</p> <p>16 that says, "in conjunction with mental health and mental</p> <p>17 retardation," it says -- it refers to "inmates who</p> <p>18 are" -- "who are determined to have mental help</p> <p>19 conditions."</p> <p>20 When it says "mental health conditions," do</p> <p>21 you know if that includes substance use or abuse, or is</p> <p>22 that separate?</p> <p>23 MS. AYACHI: Objection, form.</p> <p>24 A. To my understanding, it -- to my understanding,</p> <p>25 I believe it does include substance abuse. They would</p>	<p style="text-align: right;">Page 56</p> <p>1 A. Correct.</p> <p>2 Q. All right.</p> <p>3 If you will turn to Tab 8, which is</p> <p>4 Exhibit 8 -- which I'll mark as Exhibit 8. This is the</p> <p>5 Tarrant County Sheriff's Department Confinement Bureau</p> <p>6 Housing Division Standards Operating Procedures 908:</p> <p>7 Medical and Healthcare Service, 0001: Medical Service.</p> <p>8 This is the document that was attached.</p> <p>9 I'll represent to you this was the document that was</p> <p>10 attached to that Exhibit 7 email from Jerry Rucker?</p> <p>11 (Exhibit 8 marked.)</p> <p>12 A. Okay.</p> <p>13 Q. Do you recognize these as the standard</p> <p>14 operating procedures in effect at the time of the email</p> <p>15 in 2020 -- August 2020? Sorry.</p> <p>16 MS. AYACHI: Apologies. I just want to</p> <p>17 make sure you have the opportunity to fully review the</p> <p>18 entire document just to familiarize yourself, okay?</p> <p>19 MS. HARRIS: Absolutely.</p> <p>20 Q. (BY MS. HARRIS) Take all the time you need.</p> <p>21 A. Thank you. Yes.</p> <p>22 Q. All right.</p> <p>23 If you will turn to Page 3 of this exhibit.</p> <p>24 It's Section 1.2, Correctional Health Department.</p> <p>25 A. Okay.</p>
<p style="text-align: right;">Page 55</p> <p>1 fall under the mental health umbrella.</p> <p>2 Q. (BY MS. HARRIS) All right.</p> <p>3 If you will turn to Tab 7, which is Exhibit</p> <p>4 -- which I'll mark as Exhibit 7. This looks like an</p> <p>5 email from Jerry Rucker to you dated August 26, 2020,</p> <p>6 regarding clarification on records request.</p> <p>7 Do you recall this email?</p> <p>8 (Exhibit 7 marked.)</p> <p>9 A. No, I don't remember this.</p> <p>10 Q. (BY MS. HARRIS) Is that your email address?</p> <p>11 Is that listed correctly on the email?</p> <p>12 A. That was -- correct. That was my email at the</p> <p>13 time.</p> <p>14 Q. You don't have any reason to think you didn't</p> <p>15 get this? You just don't remember it; is that correct?</p> <p>16 A. Correct.</p> <p>17 Q. Now, who is Jerry Rucker?</p> <p>18 A. Jerry Rucker was the records supervisor at the</p> <p>19 time. He's since retired.</p> <p>20 Q. Okay.</p> <p>21 Do you remember who Lyndee Higgs is?</p> <p>22 A. Not off the top of my head. No, I don't</p> <p>23 remember.</p> <p>24 Q. So you probably don't have any recollection as</p> <p>25 to why she was requesting records?</p>	<p style="text-align: right;">Page 57</p> <p>1 Q. And it reads (as read): "The department of the</p> <p>2 Tarrant County Hospital District designated for the</p> <p>3 provision of required medical care for inmates in the</p> <p>4 Tarrant County jail units."</p> <p>5 It looks like the Tarrant County Hospital</p> <p>6 District provides health services to Tarrant County and</p> <p>7 the Correctional Health Department is a specific</p> <p>8 department within the Tarrant County Hospital District</p> <p>9 that provides health services to the Tarrant County jail</p> <p>10 units; is my understanding correct on that?</p> <p>11 A. It appears correct.</p> <p>12 We don't use the term or never used the</p> <p>13 term "Correctional Health Department." Everything was</p> <p>14 just referred to just as JPS, but it appears that the</p> <p>15 Correctional Health Department is, if you will, a</p> <p>16 division of the Tarrant County Hospital District.</p> <p>17 Q. Okay.</p> <p>18 Y'all didn't get that specific?</p> <p>19 A. Correct.</p> <p>20 Q. All right. Makes sense. All right.</p> <p>21 And then if you'll turn to the next page in</p> <p>22 Section 3.2 or -- Standard Operating Procedure 3.2, and</p> <p>23 it says (as read): "Individuals" -- Evaluate at Medical</p> <p>24 Screening. It says (as read): "Individuals accepted</p> <p>25 into the jail shall during the booking process be</p>

<p style="text-align: right;">Page 58</p> <p>1 escorted to medical screening where correctional help 2 personnel shall evaluate the individual's health status 3 to determine medical/mental health needs." 4 Who are the correction medical help 5 personnel? Do you know? 6 A. Yes. 7 That would be Tarrant County staff, Tarrant 8 County officers. 9 Q. Not the JPS folks? 10 A. It could be. But it's generally the uniform 11 staff who are doing the intake process. 12 Q. Are they employees of the Tarrant County 13 Sheriff's Office, or is that a contracted service? 14 A. Who is "they"? 15 Q. The correctional health personnel. 16 A. Correctional health personnel, that's the 17 contracted services through JPS. 18 Q. Okay. 19 So the correctional health personnel, the 20 JPS folks, will be the ones to evaluate the health 21 status; is that correct? 22 A. Correct. 23 Q. Okay. 24 All right. At the bottom of Page 4, 25 carrying over to the top of Page 5 under 3.7, it is</p>	<p style="text-align: right;">Page 60</p> <p>1 court reporter. 2 MS. HARRIS: Do you need to take a break? 3 THE CERTIFIED STENOGRAPHER: Yes, please. 4 MS. HARRIS: Okay. 5 THE VIDEOGRAPHER: We're off the record at 6 11:09. 7 (A break was taken from 11:09 a.m. to 8 11:20 a.m.) 9 THE VIDEOGRAPHER: We are back on the 10 record at 11:20 a.m. 11 Q. (BY MS. HARRIS) All right. 12 If you could turn to Tab 9, which I'm going 13 to mark as Exhibit 9. This was another document 14 attached to Mr. Rucker's email in Exhibit 7. And this 15 is one entitled, Tarrant County Sheriff's Department 16 Confinement Bureau Housing Division Standard Operating 17 Procedures 908: Medical & Healthcare Services, 003: 18 Mental Health Services. 19 Does this look familiar to you as something 20 you would have seen as a standard operating procedure? 21 (Exhibit 9 marked.) 22 A. Yes. 23 Q. (BY MS. HARRIS) If you will turn to Page 2 and 24 No. 3.2: Local MHMR Inmate. 25 What does local MHMR inmate mean?</p>
<p style="text-align: right;">Page 59</p> <p>1 Methadone Management. It says (as read): "Dispensing 2 of methadone shall be administered under the supervision 3 of the Correctional Health Department." 4 And the Correctional Health Department, I 5 believe, was that the JPS folks? 6 A. Correct. 7 Q. Okay. 8 Do you have an understanding about what 9 methadone is used for? 10 A. Yes. 11 Q. For the treatment of opioid addiction; is that 12 correct? 13 A. Correct. 14 Q. So it appears that for the Correctional Health 15 Department to administer methadone, there needed to have 16 been an assessment of addiction at the time; is that a 17 correct understanding? 18 MS. AYACHI: Objection, form. 19 A. Correct. 20 Q. (BY MS. HARRIS) Okay. 21 Are you good to take a quick break, or you 22 want to keep going? 23 A. We -- keep going. 24 Q. Okay. All right. 25 THE CERTIFIED STENOGRAPHER: This is the</p>	<p style="text-align: right;">Page 61</p> <p>1 A. I believe for the purposes of this policy it 2 means an individual who has received some sort of mental 3 health services. 4 Q. Do you know if there is a separate standard 5 operating procedure that discusses evaluation or 6 assessment for substance abuse? 7 A. That's administered by Tarrant County or by JPS 8 or MHMR? 9 Q. Any one of the three? 10 A. I don't know what MHMR or JPS administers or 11 what screening or what documents they complete as part 12 of the screening process. 13 For Tarrant County, I believe, part of the 14 intake process that's completed by TCSO, Tarrant County 15 staff, may ask about an individual's history of mental 16 health treatment, mental health issues, or drug abuse. 17 And, I believe, that's done during the booking/intake 18 process. 19 Q. Then would they be referred to JPS for 20 assessment or evaluation? 21 A. Correct. 22 Q. Okay. 23 You know if there was a contract between 24 the Tarrant County Sheriff's Office and MHMR for the 25 services provided in the Tarrant County jail units?</p>

<p style="text-align: right;">Page 62</p> <p>1 A. For my understanding, there has been since I 2 been here. 3 Q. There has been, yes? 4 A. Yes. I'm sorry. 5 Q. As deputy chief of detention services, did you 6 have any kind of role in approving or reviewing that 7 contract? 8 A. Yes. 9 Q. All right. 10 If you will turn to Tab 10, which I'll mark 11 as Exhibit 10. This looks the MHMR of Tarrant County 12 Comprehensive Annual Financial Report Yearend ending in 13 August 2020. 14 Is this something that looks familiar to 15 you that you may have seen at some point? And if it 16 helps, I can point you to Page 12 -- 17 (Exhibit 10 marked.) 18 A. Yeah. 19 Q. (BY MS. HARRIS) -- where you are listed as a 20 member of the board of trustees. 21 A. That's what I was going to say. I believe I 22 would have seen this as a member of the board or been 23 forwarded this as a member of the board. But, 24 specifically, I don't recall. 25 Q. Do all the members of the board including</p>	<p style="text-align: right;">Page 64</p> <p>1 A. Yes. 2 Q. Okay. All right. 3 Are you still a member of the board? 4 A. I think technically, yes. But, I mean, after I 5 retire, they'll fill it with someone else. 6 Q. All right. 7 If you'll turn to Page 7 of this exhibit. 8 And I'll give you a second to review the sections that 9 goes onto the next page, Page 8. That's Factors 10 Affecting Financial Condition. 11 Because then I have a couple of questions 12 about that. Then I'll let you review it first. 13 A. Okay. Page 7, okay. Go ahead. 14 Q. I didn't see any discussion -- and you can 15 point it to me if you saw it -- about opioids in this 16 section of Factors Affecting Financial Condition; is 17 that correct? 18 A. It appears so. 19 Q. It appears that there's mention of opioids in 20 that? 21 A. Correct. 22 Q. All right. 23 And then two pages after that is an 24 organizational chart. It begins on Page 10. 25 With regard to that organizational chart,</p>
<p style="text-align: right;">Page 63</p> <p>1 yourself review these, or do y'all have a specific 2 person who reviews it and let's everybody else know 3 what's in it? How does that work? 4 A. Correct. This would be -- 5 MS. AYACHI: Objection, form. 6 THE WITNESS: I'm sorry. 7 A. This would be reviewed either by MHMR's legal 8 or their executive leadership team, and then it would be 9 forwarded to the board of trustees. 10 Q. (BY MS. HARRIS) Do y'all discuss this in any 11 of your meetings and go over it in detail? 12 A. I don't recall. I believe they opened it up 13 for discussion, but I don't recall. 14 Q. You don't remember any long meetings discussing 15 this in detail? 16 A. Correct. 17 Q. Okay. 18 How long have you been a member of the 19 board of trustees for MHMR of Tarrant County? 20 A. I believe -- I think I was put on the board -- 21 it may have been in 2020 or 2019. It's more of an 22 honorary position that I was asked to fill. I think 23 2019 or 2020. I don't recall the exact year. 24 Q. Did Tarrant County Sheriff's Office ask you to 25 sit as a board member?</p>	<p style="text-align: right;">Page 65</p> <p>1 can you -- is it easy for you -- or I don't know if 2 you're able to or not point to the person or position 3 that would oversee the services provided to the Tarrant 4 County jail units? 5 A. It's -- point to it or just -- 6 Q. Can you tell me? Sorry. 7 A. Ramey Heddings. He's at the bottom, if I'm 8 looking at the same one. 9 Q. Oh, chief of behavioral health services? 10 A. Correct. 11 Q. All right. 12 On the next to the last line. 13 A. Uh-huh. 14 Q. Are there five facilities within the Tarrant 15 County jail; is that correct? 16 A. Correct. 17 Q. All right. 18 Do you know if MHMR contracted for each 19 facility separately, or was it one contract for all of 20 them? 21 MS. AYACHI: Objection, form. 22 A. It's one contract. 23 Q. (BY MS. HARRIS) Okay. 24 Are you familiar enough with this report to 25 show me where I can locate the amount of revenue MHMR</p>

<p style="text-align: right;">Page 66</p> <p>1 received from the services provided to the Tarrant 2 County jail units? 3 A. No. 4 Q. Okay. 5 Is the MHMR contract to provide services to 6 Tarrant County jail units a yearly contract, or what is 7 the length, if you recall? 8 A. I don't recall. 9 Q. Okay. 10 Do you recall if MHMR ever attributed any 11 contractual increase due to the increase cost and 12 services as a result of opioids? 13 MS. AYACHI: Objection, form. 14 A. Not specific to opioids, no. 15 Q. (BY MS. HARRIS) Do you know where MHMR 16 receives its funding? 17 A. I understand it's taxpayer funded; but, 18 specifically, no, I don't know. 19 Q. Okay. 20 Do you know if this funding changed in any 21 manner due to opioids? 22 A. No. No, I don't know. Sorry. 23 Q. You don't know. That's why I was fixing to 24 correct, and say you don't know, correct? 25 Is there a person who might know this</p>	<p style="text-align: right;">Page 68</p> <p>1 middle, Early Childhood Services. It looks like every 2 year since 2012, there has been an increase. 3 Does that look -- am I reading that 4 correctly? 5 A. Correct. 6 Q. And then if you'll look for one -- over to the 7 left, Behavioral Health Substance Youth Disorders. It 8 looks like 2016 to 2020 -- there was a decrease from 9 2016 to 2020. 10 Am I reading that correctly? 11 A. Correct. 12 Q. All right. All right. 13 Let's turn to Tab 11, which I'm going to 14 mark as Exhibit 11. This is an email from Jennifer 15 Gabbert. 16 Who is Jennifer Gabbert? 17 (Exhibit 11 marked.) 18 A. She is the sheriff's office chief of staff. 19 Q. (BY MS. HARRIS) To you and Charles Eckert. 20 Do you remember -- I'll give you a second 21 to look at this email. 22 Do you remember this email? 23 A. Yes. 24 Q. Okay. 25 If you'll look at the second page, there is</p>
<p style="text-align: right;">Page 67</p> <p>1 information on this organizational chart? 2 A. I'm sure there is. I wouldn't be able to 3 direct you to. 4 Q. Okay. 5 A. It could be the CFO or the CEO, but I wouldn't 6 be able to direct you to the specific individual. 7 Q. In this same exhibit, if you'll turn to the end 8 of Page 84, and that is Bates No. 831357. 9 All right. This is a table of MHMR 10 expenses. Expenditure by Activity for the Last Ten 11 Years. 12 Do you have that in front of you? 13 A. Yes. 14 Q. All right. 15 And it looks like on the left-most column, 16 it has Behavioral Health, Mental Health Adult. And it 17 looks like -- and tell me if I'm reading this correctly, 18 but ever since 2012, it looks like the expenses have 19 risen through 2020. 20 Does that look correct to you? 21 MS. AYACHI: Objection, form. 22 A. Assuming these are dollars because there's no 23 dollar sign, yes, the number has increased. 24 Q. (BY MS. HARRIS) All right. 25 And the same with -- if you'll look to the</p>	<p style="text-align: right;">Page 69</p> <p>1 a September 8th -- here at the very bottom, 2 September 8th email from you -- September 8, 2021, email 3 from you to Charles Eckert and Mike Simonds. 4 And Mike Simonds was the executive chief 5 deputy; is that right? 6 A. He was the senior chief deputy. 7 Q. Senior chief deputy. 8 And in that second paragraph, you say (as 9 read): "Chief Eckert implemented a weekly report that 10 MHMR sends to us and is very helpful in getting a 11 snapshot of what is going on from a MHMR perspective in 12 the jail. I think including this as a requirement in 13 the agreement would be helpful." 14 What kind of information did that weekly 15 report provide? 16 A. Where are you looking at? 17 Q. Oh, I'm sorry. It is on the second -- on the 18 third page. Your email starts at the bottom of the 19 second page and goes to the top of the third. 20 A. I found it. 21 Q. It starts off with Chief Eckert. 22 A. Can you repeat the question? 23 Q. Sure. 24 After reading that paragraph that starts 25 with Chief Eckert, it talks about a MHMR weekly report.</p>

<p style="text-align: right;">Page 70</p> <p>1 What kind of information did that report 2 contain that was helpful? 3 A. From what I recall, it was the total number 4 of -- it was a snapshot of, like, total number of MHMR 5 referrals, of those how many were seen, within how many 6 hours they were seen, the longest -- the number of hours 7 that have elapsed for pending requests. I believe 8 that -- it just contained, sort of, performance 9 measures, if you will, on a weekly basis so that we 10 could make sure that people were being seen in a timely 11 manner. 12 Q. Okay. All right. 13 If you will then turn to Tab 12, which I 14 marked as Exhibit 12. This states that (as read): "It 15 is fiscal year 2022 contract between Tarrant County and 16 MHMR of Tarrant County for Behavior Health Intellectual 17 Disability Services for Inmates at the Tarrant County 18 Jail." 19 Are you familiar with this contract? 20 (Exhibit 12 marked.) 21 A. I've seen it before. I think this was the 22 contract that I was responding to in the previous email. 23 Q. (BY MS. HARRIS) Okay. 24 A. But I don't recall. I mean, these all look the 25 same.</p>	<p style="text-align: right;">Page 72</p> <p>1 Q. (BY MS. HARRIS) And then is this a contract 2 you would have seen at some point? 3 A. At some point, I'm sure I would have seen it. 4 Q. And the third paragraph -- third whereas. 5 Shows the county received 3,867,601 for fiscal year 6 2020. 7 A. Correct. 8 Q. Do you know where Tarrant County Hospital 9 District gets the funds to pay this amount? 10 A. No. 11 Q. Okay. 12 And is it correct that the services 13 provided by MHMR are paid for by the Tarrant County 14 Hospital District and not the county itself; is that 15 correct? 16 MS. AYACHI: Objection, form. 17 A. Can you repeat that? 18 Q. (BY MS. HARRIS) Are the services provided by 19 MHMR paid for by the Tarrant County Hospital District 20 and not the county? 21 A. I don't know. 22 Q. Okay. 23 If you'll turn to Page 7. This contract, 24 and it's 7 of 9, but it's 13.008 at the bottom of my 25 page.</p>
<p style="text-align: right;">Page 71</p> <p>1 Q. Totally understand. 2 And then Paragraph 3, the third whereas 3 paragraph. It says (as read): "Tarrant County received 4 5,691,167.63 for fiscal year 2022 from the Tarrant 5 County Hospital District for provisions of this 6 service." 7 Does that look correct to you? Did I read 8 that correctly? 9 A. Correct. 10 Q. Do you know if these services would include 11 substance abuse? 12 A. Can you explain what you mean by -- like 13 substance abuse treatment? Screening? 14 Q. Treatment, correct. 15 A. I believe so. 16 Q. All right. 17 If you will turn to Tab 13, which I'll mark 18 as Exhibit 13. It's another contract. But the very 19 first page, it says (as read): "Commissioners Court 20 Communication. Approval of a Contract Between Tarrant 21 County and MHMR of Tarrant County for mental health 22 services for inmates in the Tarrant County system." And 23 this one's fiscal year 2020. 24 (Exhibit 13 marked.) 25 A. Correct.</p>	<p style="text-align: right;">Page 73</p> <p>1 A. Okay. Okay. 2 Q. And it says the Exhibit B, and it's Duties of 3 MHMR PC. And on the very first No. 1, the very first 4 sentence, it says (as read): "Provide mental health 5 service as defined Texas Health and Safety Code, Title 7 6 571.003. 7 So whatever services they are supposed to 8 provide, it looks like it's the services outlined in 9 that chapter of the Texas Health and Safety Code; is 10 that a correct understanding? 11 MS. AYACHI: Objection, form. 12 A. Yes. 13 Q. (BY MS. HARRIS) Okay. All right. 14 Turn to Exhibit 14 -- or Tab 14, which I'm 15 going to mark as Exhibit 14. And it's an email from 16 Charles Eckert to Sheriff Waybourn, and it includes you. 17 Do you remember this email? 18 (Exhibit 14 marked.) 19 A. No. 20 Q. (BY MS. HARRIS) Do you have any reason to 21 believe you wouldn't have received it? It's just that 22 you don't remember it? 23 A. Correct. 24 Q. Okay. 25 When it says -- in the very first paragraph</p>

<p style="text-align: right;">Page 74</p> <p>1 -- and Chief Eckert says (as read): "I met with Paul 2 today." It's in the second line. 3 Who would be Paul be? 4 A. Paul Celestin, he was the -- I believe his 5 title was executive director for Correctional Health. 6 He was a JPS employee. He's since retired. 7 Q. Okay. 8 So did JPS provide all of the screening and 9 treatment for substance abuse in the Tarrant County jail 10 units? And I'll repeat that. 11 Did JPS provide all of the screening and 12 treatment for substance abuse in the Tarrant County jail 13 units? 14 A. I believe JPS did it jointly with MHMR. 15 Q. Okay. All right. 16 Let's turn to Exhibit 15 -- or Tab 15, 17 which I'll mark as Exhibit 15. It's an email from Paul 18 Celestin to you and Glen Richardson regarding Narcan, 19 and it's dated 5/26/2021. 20 Do you recall this email? I'll give you a 21 chance to look at it. 22 (Exhibit 15 marked.) 23 A. Yes. 24 Q. (BY MS. HARRIS) In the bottom email, Paul 25 writes and asks -- it looks like in the second line,</p>	<p style="text-align: right;">Page 76</p> <p>1 there was a specific incident or something that happened 2 that prompted him to send this. 3 Q. All right. 4 It looks like you then sent this request to 5 Charles Eckert -- Chief Eckert. 6 And who is Glen Richardson? 7 A. So it appears that this email took place at a 8 time when we had a change in leadership in the jail. So 9 at -- so Charles Eckert now would have been promoted 10 from the -- from one of the assistant jail 11 administrators to the executive -- I mean to the 12 executive chief deputy to the jail administrator. And 13 Glen Richardson would have been the second jail 14 administrator -- assistant jail administrator. I'm 15 sorry. 16 Q. Would they have been the ones to answer Paul's 17 question and talk to him? Is that why you forwarded it 18 to them? 19 A. Not Glen. Glen was included more of an FYI. 20 Q. Uh-huh. 21 A. Charles Eckert would be the one who would 22 approve something like this, an initiative like this. 23 Q. Okay. 24 Let's look at Tab 16, which I'll mark as 25 Exhibit 16. And it looks like it's the continuation of</p>
<p style="text-align: right;">Page 75</p> <p>1 midway down (as read): "Can TCJ can provide" -- or 2 wait. "TCJ can provide Narcan kits to high-risk 3 individuals at the time of release. We would like to 4 know if TCJ can provide Narcan kits to high-risk 5 individuals at the time of release." 6 TCJ. Is that Tarrant County jail? 7 A. Correct. 8 Q. Okay. 9 Do you have an understanding of what 10 Mr. Celestin meant by "high-risk individuals"? 11 A. I'm sorry. I'm reading the email real quick. 12 Q. Uh-huh. 13 A. Yeah, I believe high-risk individuals in Paul 14 Celestin's email here is individuals who either have a 15 history of opioid use or have, I guess, a history of 16 opioid overdose. That's what he's defining as a high 17 risk -- or that's the term. That's what he's referring 18 to when he says high-risk individuals. 19 Q. Do you know what if -- what, if anything, 20 prompted him to send this email in 2021? 21 MS. AYACHI: Objection, form. 22 A. I don't know. 23 Q. (BY MS. HARRIS) You didn't know; is that 24 correct? 25 A. Yeah, I don't recall what specifically -- but</p>	<p style="text-align: right;">Page 77</p> <p>1 the email chain regarding Narcan, and it's May 26, 2021. 2 And I'll give you a second to review this. 3 (Exhibit 16 marked.) 4 A. Okay. 5 Q. (BY MS. HARRIS) On the second page in this 6 string email, your email -- and you ask Paul (as read): 7 "Who will provide the Narcan?" And if you turn back, he 8 says (as read): "JPS will provide the Narcan" on 9 Page 1. And then it looks like Chief Eckert then 10 responds, (as read): "Here recently it seems we were 11 asked to buy Narcan so JPS could have it on hand in case 12 overdoses occurred. Is the current status that we 13 bought for JPS and JPS is going to give for free as 14 inmates leave custody. Am I missing something?" 15 Was he missing something, or was that the 16 case? 17 MS. AYACHI: Objection, form. 18 A. I think he was missing something. I think he 19 was -- his understanding was that if we moved forward 20 with the initiative that Paul was recommending of 21 providing Narcan to inmates upon release that the Narcan 22 provided would be from the supply that the sheriff's 23 office was purchasing and providing to JPS for use and 24 emergencies within the facility. 25 Q. (BY MS. HARRIS) You don't have a lot of</p>

<p style="text-align: right;">Page 78</p> <p>1 overdoses occurring in the jail facility?</p> <p>2 A. Can you define "a lot"?</p> <p>3 Q. I was going to say was it a weekly? Monthly?</p> <p>4 Yearly? Daily? How often did -- were there overdoses</p> <p>5 in the jail -- Tarrant County jail?</p> <p>6 A. I mean, I wouldn't be able to give you, you</p> <p>7 know, a rate of frequency, but we have had overdoses in</p> <p>8 the jail.</p> <p>9 Q. Okay.</p> <p>10 Is there any particular substance that you</p> <p>11 were seeing overdoses related to?</p> <p>12 MS. AYACHI: Objection, form.</p> <p>13 A. There is substances that we suspect, which is</p> <p>14 why we started carrying Narcan. We suspect it was</p> <p>15 fentanyl. But until they go out for testing or we</p> <p>16 actually receive medical information that confirms the</p> <p>17 substance, we don't know. We -- the Tarrant County</p> <p>18 Sheriff's Office won't know specifically what somebody</p> <p>19 overdosed on.</p> <p>20 Q. (BY MS. HARRIS) Do you recall ever seeing any</p> <p>21 overdoses related to prescription opioids in the Tarrant</p> <p>22 County jail?</p> <p>23 MS. AYACHI: Objection, form.</p> <p>24 A. I don't -- no, I don't recall. Not that it's</p> <p>25 never happened. I just don't know.</p>	<p style="text-align: right;">Page 80</p> <p>1 A. I don't know.</p> <p>2 Q. You don't know.</p> <p>3 But that's not the same thing as Narcan,</p> <p>4 correct? Buprenorphine?</p> <p>5 A. I don't know.</p> <p>6 Buprenorphine -- I mean, I've heard both</p> <p>7 terms Narcan and bupnorphine, but I wouldn't be able to</p> <p>8 tell you if they're the same thing or not.</p> <p>9 Q. Okay.</p> <p>10 And Narcan is used to reverse the effects</p> <p>11 of opioids after an overdose; is that correct?</p> <p>12 A. That's my understanding. Correct.</p> <p>13 Q. And it's talking about -- in that second</p> <p>14 paragraph of that same email about an initiative Sheriff</p> <p>15 Waybourn had been pushing for the past two years.</p> <p>16 Do you know what initiative they were</p> <p>17 discussing?</p> <p>18 A. From the context of the email, it appears, it's</p> <p>19 that Right Time Right Treatment. Oh, I'm sorry.</p> <p>20 It appears that it's making Narcan</p> <p>21 available to inmates with opioid addiction. I'm just</p> <p>22 getting that from the context of the email.</p> <p>23 Q. Understand.</p> <p>24 Do you have any knowledge on why Sheriff</p> <p>25 Waybourn may have been pushing this initiative?</p>
<p style="text-align: right;">Page 79</p> <p>1 Q. (BY MS. HARRIS) You know if JPS asked Tarrant</p> <p>2 County Sheriff's Office to purchase the Narcan?</p> <p>3 A. I don't remember if they -- if they</p> <p>4 specifically asked us to purchase it.</p> <p>5 Q. But then Tarrant County actually purchased</p> <p>6 it -- Tarrant County Sheriff's Office? I'm sorry.</p> <p>7 A. Yeah. Correct.</p> <p>8 I'll say I don't know if we purchased it or</p> <p>9 how it was provided. I just know through the channels</p> <p>10 established here, it was requested, and it appeared in</p> <p>11 my office. So I don't know who paid for it and how it</p> <p>12 was acquired, if you will.</p> <p>13 Q. Understand.</p> <p>14 All right. Then I'm looking at the top</p> <p>15 email from Paul, and it says (as read): "JPS has</p> <p>16 received the Right Time Right Treatment grant to</p> <p>17 increase access of buprenorphine to patients with opioid</p> <p>18 use disorder in Tarrant County."</p> <p>19 Do you see where I'm reading?</p> <p>20 A. Yes.</p> <p>21 Q. All right.</p> <p>22 Do you know whether the Right Time Right</p> <p>23 Treatment grant JPS received was for the use of</p> <p>24 buprenorphine in Tarrant County and not specific to</p> <p>25 Tarrant County inmates?</p>	<p style="text-align: right;">Page 81</p> <p>1 A. I do not.</p> <p>2 Q. Okay.</p> <p>3 All right. Let's turn to Tab 17, which I'm</p> <p>4 going to mark as Exhibit 17.</p> <p>5 And this is an email from Paul to yourself.</p> <p>6 Paul Celestin. Sorry. Tab 19. Sorry. I'm having to</p> <p>7 back up.</p> <p>8 Turn to Tab 19 that I'm going to mark as</p> <p>9 Exhibit 17. Sorry. I skipped around on myself.</p> <p>10 Tab 19, which I'm marking as Exhibit 17.</p> <p>11 And it's an email from Paul Celestin to you</p> <p>12 and Michael Gravitt.</p> <p>13 And who is Michael Gravitt?</p> <p>14 (Exhibit 17 marked.)</p> <p>15 A. Michael Gravitt was a captain with the</p> <p>16 sheriff's office in the jail, and he's since retired. I</p> <p>17 think he retired in 2019 maybe.</p> <p>18 Q. (BY MS. HARRIS) And it's also to Chief</p> <p>19 Cundiff.</p> <p>20 And it looks like this email was in</p> <p>21 December 13th, 2019, which is about a year and a half</p> <p>22 prior to the other email we just looked at.</p> <p>23 Do you remember this email?</p> <p>24 A. No.</p> <p>25 Q. Okay.</p>

<p style="text-align: right;">Page 82</p> <p>1 You're not saying you didn't get it; you're</p> <p>2 just saying you don't remember it; is that correct?</p> <p>3 A. Correct.</p> <p>4 Q. All right.</p> <p>5 And if you'll look at Tab 18, which I'll</p> <p>6 mark as Exhibit -- no. Sorry. Not Tab 18. Tab 20.</p> <p>7 Tab 20, which I'm going to mark as Exhibit 18. The is</p> <p>8 the attachment to that email. Tab 20, which I'm marking</p> <p>9 as Exhibit 18.</p> <p>10 And I'll give you a chance to look at that</p> <p>11 attachment.</p> <p>12 (Exhibit 18 marked.)</p> <p>13 A. So 20 is the attachment for 19, correct?</p> <p>14 Q. (BY MS. HARRIS) Correct.</p> <p>15 A. Okay. Okay.</p> <p>16 Q. All right.</p> <p>17 And it looks like on December 12, 2019,</p> <p>18 it's a -- JPS is announcing that (as read): "Effective</p> <p>19 today, December 12, 2019, JPS Correctional Health will</p> <p>20 be utilizing Narcan nasal spray at the Tarrant County</p> <p>21 jail as needed when we have patients presenting with</p> <p>22 opioid overdose symptoms."</p> <p>23 When he's discussing patients presenting</p> <p>24 with opioid overdose systems -- symptoms, do you have an</p> <p>25 understanding about who he's referring to? Is it intake</p>	<p style="text-align: right;">Page 84</p> <p>1 next tab, Exhibit 18, which I'll mark as Exhibit 20,</p> <p>2 that is the PowerPoint presentation attached to that</p> <p>3 email.</p> <p>4 (Exhibit 19 marked.)</p> <p>5 A. I don't recall this specific email.</p> <p>6 Q. (BY MS. HARRIS) Do you recall the PowerPoint</p> <p>7 presentation under Tab 18 that went with it by chance?</p> <p>8 A. I believe this was a presentation that Pedigo,</p> <p>9 who was a captain at that time, gave as part of a</p> <p>10 program that she was in.</p> <p>11 Q. Do you recall what kind of program she would</p> <p>12 have been IN to prepare this?</p> <p>13 A. It was -- if I'm correct, it was the Tarrant</p> <p>14 County Leadership Development Program.</p> <p>15 Q. All right.</p> <p>16 If you'll look at the fifth page of the</p> <p>17 PowerPoint on Exhibit 20, Tab 18. It's kind of hard to</p> <p>18 read, but it has Tarrant County jail. And it says, five</p> <p>19 jails.</p> <p>20 And are those the five jails listed there</p> <p>21 when it says bed capacity? It looks like there's five</p> <p>22 bullet points.</p> <p>23 Are those the five jails?</p> <p>24 (Exhibit 20 marked.)</p> <p>25 A. Correct.</p>
<p style="text-align: right;">Page 83</p> <p>1 or is it inmates?</p> <p>2 A. It's inmates regardless of where they're at in</p> <p>3 the system or the process of jail.</p> <p>4 Q. Okay.</p> <p>5 So this would have been inmates that</p> <p>6 overdosed while in jail?</p> <p>7 A. Yes.</p> <p>8 Q. Okay.</p> <p>9 Was that a problem in 2019 for them to</p> <p>10 implement this system?</p> <p>11 MS. AYACHI: Objection, form.</p> <p>12 A. Was -- was the overdose a problem? Is that</p> <p>13 what you're asking?</p> <p>14 Q. (BY MS. HARRIS) Right. Yes.</p> <p>15 Inmates overdosing in jail. Was that a</p> <p>16 problem for them to implement this system?</p> <p>17 A. Yes.</p> <p>18 Q. Okay.</p> <p>19 Now, let's flip back to Tab 17, which I'm</p> <p>20 going to mark as Exhibit 19. And it's an email from</p> <p>21 Emily Pedigo to yourself and others. And it's</p> <p>22 transmitting a JPS correctional Health PowerPoint</p> <p>23 presentation in September 27, 2018.</p> <p>24 Do you recall this email?</p> <p>25 And if you want to go ahead and look at the</p>	<p style="text-align: right;">Page 85</p> <p>1 Q. (BY MS. HARRIS) All right.</p> <p>2 Did JPS provide medical service for all of</p> <p>3 those facilities?</p> <p>4 A. Yes.</p> <p>5 Q. Okay.</p> <p>6 And on Page 13 of that same exhibit, I have</p> <p>7 John Peter Smith Correctional Health. And it says (as</p> <p>8 read): "JPSH has provided correctional healthcare since</p> <p>9 1995 to Tarrant County Sheriff's Office."</p> <p>10 Is that your understanding as well; that</p> <p>11 they've been there for that long?</p> <p>12 A. Yes.</p> <p>13 Q. Okay.</p> <p>14 And it says, the annual budget is</p> <p>15 13,464,114.</p> <p>16 Was this amount paid by Tarrant County</p> <p>17 Sheriff's Office to JPS, or was this simply the budget</p> <p>18 for services provided to Tarrant County Sheriff's</p> <p>19 Office?</p> <p>20 MS. AYACHI: Objection, form.</p> <p>21 THE WITNESS: I'm sorry.</p> <p>22 A. I don't know.</p> <p>23 Q. (BY MS. HARRIS) Do you have any idea or any</p> <p>24 understanding where JPS obtained the funding for this</p> <p>25 budget?</p>

<p style="text-align: right;">Page 86</p> <p>1 A. No.</p> <p>2 Q. All right.</p> <p>3 Let's flip to Page 17 of this same exhibit.</p> <p>4 It says (as read): "What services are provided?" And</p> <p>5 it doesn't look like they list substance abuse as a</p> <p>6 treatment for substance abuse as a treatment service</p> <p>7 provided; is that correct?</p> <p>8 A. It's correct. Yeah, substance abuse is not</p> <p>9 listed here.</p> <p>10 Q. Okay.</p> <p>11 And let's flip to Page 19 of this same</p> <p>12 exhibit. Two over.</p> <p>13 A. You said page --</p> <p>14 Q. Yes. It is -- on mine, it has 18.0019. And at</p> <p>15 the top, it says "What services are provided?"</p> <p>16 A. All right. I'm there.</p> <p>17 Q. All right.</p> <p>18 And it's talking about inpatient services,</p> <p>19 and it does not list treatment for substance abuse there</p> <p>20 either. It doesn't look like.</p> <p>21 Am I seeing that correctly?</p> <p>22 A. Correct.</p> <p>23 Q. All right.</p> <p>24 Now, let's flip another couple of pages to</p> <p>25 21. And the top of it says Medications at the very top.</p>	<p style="text-align: right;">Page 88</p> <p>1 A. Correct.</p> <p>2 Q. And we may have touched on this before, but do</p> <p>3 you have an understanding what the term "diversion"</p> <p>4 means in the context of prescription medications?</p> <p>5 A. No.</p> <p>6 Q. Okay.</p> <p>7 Would you have any understanding whether</p> <p>8 drugs stolen during through a pharmacy burglary would be</p> <p>9 considered diverted?</p> <p>10 MS. AYACHI: Objection, form.</p> <p>11 A. If you could define diversion or diverted in</p> <p>12 terms of, you know, of prescription medication or drugs,</p> <p>13 I think I'd be able to better answer that.</p> <p>14 Q. (BY MS. HARRIS) Well, that's what I was kind</p> <p>15 of wondering.</p> <p>16 A. Yeah.</p> <p>17 Q. If you had any, kind of, usage of term within</p> <p>18 the area of pharmacy burglary and prescription fraud?</p> <p>19 If you had any use of the term?</p> <p>20 A. No. It means something totally different in</p> <p>21 the terms of jails.</p> <p>22 Q. Okay.</p> <p>23 What does it mean in terms of jail?</p> <p>24 A. In terms of jail, diversions refers to</p> <p>25 alternative to incarceration. So somebody who's</p>
<p style="text-align: right;">Page 87</p> <p>1 And I don't know if you have an understanding, but it</p> <p>2 doesn't look like the list has any medications for the</p> <p>3 treatment of substance abuse to me.</p> <p>4 But if you see something on there that you</p> <p>5 think is for the treatment of substance abuse, in your</p> <p>6 understanding, let me know.</p> <p>7 A. So my understanding, methadone would be</p> <p>8 medication for -- to treat substance abuse.</p> <p>9 Q. Okay.</p> <p>10 Let's turn to Tab 21, which I'll mark as</p> <p>11 Exhibit 21. It's an email from David Grantham.</p> <p>12 And who is David Grantham again?</p> <p>13 (Exhibit 21 marked.)</p> <p>14 A. At the time of this email, he was the director</p> <p>15 of intelligence.</p> <p>16 Q. (BY MS. HARRIS) All right.</p> <p>17 And it's regarding DEA, FBI intelligence</p> <p>18 bulletin. (As read): "Violent street gangs almost</p> <p>19 certainly fueling opioid crisis through prescription</p> <p>20 fraud and pharmacy burglaries."</p> <p>21 I'll give you a chance to review this email</p> <p>22 to see if you remember it.</p> <p>23 A. I don't specifically remember the email.</p> <p>24 Q. No reason to believe you didn't receive it,</p> <p>25 though, correct?</p>	<p style="text-align: right;">Page 89</p> <p>1 arrested, we would divert them by sending them to some</p> <p>2 sort of community program or a diversion program, a</p> <p>3 sobriety center. Something to keep them out of jail to</p> <p>4 reduce jail population. That's what diversion means in</p> <p>5 the jail world.</p> <p>6 Q. Okay.</p> <p>7 So you haven't ever used it in the context</p> <p>8 of --</p> <p>9 A. Correct.</p> <p>10 Q. -- medications? Okay.</p> <p>11 A. Correct.</p> <p>12 Q. All right. Let's flip to Tab 22, Exhibit --</p> <p>13 which I'll mark as Exhibit 22.</p> <p>14 This is an email to the Sheriff's</p> <p>15 Collection Team forwarding the June 2021 Intelligence</p> <p>16 Review, and then the attachment is in Tab 23, which I'll</p> <p>17 mark it as Exhibit 23.</p> <p>18 (Exhibit 22 marked.)</p> <p>19 (Exhibit 23 marked.)</p> <p>20 A. Okay.</p> <p>21 Q. (BY MS. HARRIS) Do you recall this email and</p> <p>22 attachment?</p> <p>23 A. Not specifically.</p> <p>24 Q. Okay.</p> <p>25 No reason to think you didn't receive it,</p>


<p style="text-align: right;">Page 90</p> <p>1 though, correct?</p> <p>2 A. Correct. Sorry.</p> <p>3 Q. Uh-huh.</p> <p>4 Let's turn to the attachment in tab --</p> <p>5 Exhibit 23, and let's flip to the fifth page of that</p> <p>6 exhibit. And then on the very paragraph, it says (as</p> <p>7 read): "As of June 2021, it was said that the</p> <p>8 Mid-Cities area -- Euless, Bedford, Hurst -- is flooded</p> <p>9 with fentanyl pills and powder that are coming from</p> <p>10 plugs in Fort Worth and Dallas."</p> <p>11 What are plugs?</p> <p>12 A. Plugs would be individuals who sell drugs.</p> <p>13 Drug dealers or drug suppliers.</p> <p>14 Q. To your knowledge, was this statement accurate?</p> <p>15 A. I don't know. This was prepared by the</p> <p>16 Intelligence Division. So I didn't do any background,</p> <p>17 any investigation, or any work on this.</p> <p>18 Q. You don't have any reason to think this</p> <p>19 statement's not accurate, I guess, is a good way to say</p> <p>20 it?</p> <p>21 A. Correct.</p> <p>22 Q. All right.</p> <p>23 Then the first sentence at the next</p> <p>24 paragraph, it says (as read): "Local dealers have also</p> <p>25 turned to pill pressers in hopes of being able to</p>	<p style="text-align: right;">Page 92</p> <p>1 that the number of heroin users continues to rise as</p> <p>2 well because dealers are cutting it with powder</p> <p>3 fentanyl."</p> <p>4 Do you have any reason to believe that this</p> <p>5 statement is not accurate?</p> <p>6 A. No.</p> <p>7 Q. Okay. All right.</p> <p>8 Let's flip to Tab 26, which I will mark as</p> <p>9 Exhibit 24.</p> <p>10 You're listed as a recipient on this email</p> <p>11 somewhere in that email chain. It's from David</p> <p>12 Grantham, and it's on June 2, 2021. And the subject is</p> <p>13 Yesterday's Meeting.</p> <p>14 And I'll give you a second to review the</p> <p>15 email.</p> <p>16 (Exhibit 24 marked.)</p> <p>17 A. Okay.</p> <p>18 Q. (BY MS. HARRIS) On these -- it looks like the</p> <p>19 third paragraph where it says (as read): "Second</p> <p>20 fentanyl is a major problem and getting worse. They are</p> <p>21 arriving mostly in pill form, blue and green on M30 on</p> <p>22 it or M one side and 30 on the other."</p> <p>23 Do you have any understanding on why these</p> <p>24 pills may have been made with M30 or M on one side and</p> <p>25 30 on the other?</p>
<p style="text-align: right;">Page 91</p> <p>1 capitalize on the availability of powder, although many</p> <p>2 have yet to perfect the process."</p> <p>3 Do you know what a pill press is?</p> <p>4 A. Yes.</p> <p>5 Q. What is that?</p> <p>6 A. So the device that is used, from my</p> <p>7 understanding, to turn a powder substance into a pill by</p> <p>8 compressing it.</p> <p>9 Q. Do you know why dealers would turn to pill</p> <p>10 presses?</p> <p>11 A. I mean, I could only speculate. I don't know</p> <p>12 why dealers do what they do.</p> <p>13 Q. Does anybody really?</p> <p>14 A. No.</p> <p>15 Q. In part -- could it be because they're trying</p> <p>16 to manufacture counterfeit pills, in part?</p> <p>17 MS. AYACHI: Objection, form.</p> <p>18 A. It could be.</p> <p>19 Q. (BY MS. HARRIS) All right.</p> <p>20 Do you have any reason to think that this</p> <p>21 is statement is not accurate?</p> <p>22 A. No.</p> <p>23 Q. Okay.</p> <p>24 . All right. Then the first sentence of</p> <p>25 the third paragraph, it says (as read): "It was set</p>	<p style="text-align: right;">Page 93</p> <p>1 A. No. Not specifically.</p> <p>2 Q. Okay.</p> <p>3 Anything generally?</p> <p>4 A. I think they're stamping them to make them look</p> <p>5 like -- they're stamping street drugs to make them look</p> <p>6 like legitimate pills, I guess.</p> <p>7 Q. No reason to think that this statement was not</p> <p>8 accurate, correct?</p> <p>9 A. Correct.</p> <p>10 Q. Let's turn back to Tab 24, which I'll mark as</p> <p>11 Exhibit 25. And the bottom email or -- I guess, the</p> <p>12 middle email is from you to David McClelland in</p> <p>13 March 26, 2018, and I'll give you a chance to review it.</p> <p>14 (Exhibit 25 marked.)</p> <p>15 A. Okay.</p> <p>16 Q. (BY MS. HARRIS) All right.</p> <p>17 David McClellan was the chief of staff at</p> <p>18 the time, correct?</p> <p>19 A. Correct.</p> <p>20 Q. All right.</p> <p>21 What is the JMS Project?</p> <p>22 A. JMS Project is a jail management system</p> <p>23 project. It was a project that the county undertook to</p> <p>24 develop its own homemade jail management solution as</p> <p>25 opposed to buying one off the shelf.</p>

<p style="text-align: right;">Page 94</p> <p>1 Q. All right.</p> <p>2 Why would the Securus Elevate Summit be a</p> <p>3 good -- great R&D opportunity?</p> <p>4 A. During the jail management system project, we</p> <p>5 were creating -- or the county was creating a jail</p> <p>6 management system from the ground up. So I recommended</p> <p>7 going to this summit just to get information on things</p> <p>8 like -- if you look at the next page it talks about</p> <p>9 human trafficking, opioid crisis, future of corrections,</p> <p>10 so on, so forth. Anything that's tied to data.</p> <p>11 So my recommendation was based on if we</p> <p>12 could collect data from individuals that are booked into</p> <p>13 the facility that maybe relates to some of this stuff or</p> <p>14 some of these topics, then we could use that in the</p> <p>15 future for, you know, initiating programs or, you know,</p> <p>16 directing our resources and initiatives and, you know,</p> <p>17 know where to focus our time and attention to.</p> <p>18 Q. Okay.</p> <p>19 Let's flip to Tab 28, Exhibit -- which will</p> <p>20 be Exhibit 26. And it is an email from Chief Eckert to</p> <p>21 yourself regarding possession of narcotics in law and</p> <p>22 evidence, February 12, 2017, and it's the very bottom</p> <p>23 email.</p> <p>24 Do you recall -- I'll give you a second to</p> <p>25 review it. Just let me know if you recall it.</p>	<p style="text-align: right;">Page 96</p> <p>1 Q. (BY MS. HARRIS) Was that very common to find</p> <p>2 -- I guess, on average during this timeframe in 2017, if</p> <p>3 you remember, was it common to find an inmate in</p> <p>4 possession of drugs?</p> <p>5 A. So I started the sheriff's office in August of</p> <p>6 2017.</p> <p>7 Q. Uh-huh.</p> <p>8 A. So for -- from time to time that I -- from when</p> <p>9 I started -- the time to 2017 when I was here, yes, it</p> <p>10 was a problem. Finding inmates not just with drugs, but</p> <p>11 contraband in general.</p> <p>12 Q. What were the most common drugs found in</p> <p>13 possession of inmates?</p> <p>14 MS. AYACHI: Objection, form.</p> <p>15 A. Pills. Prescription -- what we call</p> <p>16 prescription pills, but we don't know if they were</p> <p>17 prescribed to them -- but pills and other paper and</p> <p>18 other items that were -- what we believed were either</p> <p>19 sprayed with or soaked in some sort of substance.</p> <p>20 Q. (BY MS. HARRIS) Do you recall what kind of</p> <p>21 pills in general?</p> <p>22 A. I mean, what they tested for, I don't know. I</p> <p>23 can just tell you how they were described in many of the</p> <p>24 reports and notifications that were sent.</p> <p>25 During that time, I think we were seeing</p>
<p style="text-align: right;">Page 95</p> <p>1 (Exhibit 26 marked.)</p> <p>2 A. Okay.</p> <p>3 Q. (BY MS. HARRIS) Okay.</p> <p>4 Do you recall this email?</p> <p>5 A. Not specifically.</p> <p>6 Q. No reason to think you didn't get it, though,</p> <p>7 correct?</p> <p>8 A. Correct.</p> <p>9 Q. All right.</p> <p>10 And it looks like Chief Eckert was</p> <p>11 informing that a female inmate was found in possession</p> <p>12 of a suspected methamphetamine and marijuana.</p> <p>13 In your experience, how does an inmate get</p> <p>14 drugs into a jail facility?</p> <p>15 MS. AYACHI: Objection, form.</p> <p>16 A. There's several ways. One of the ways is, they</p> <p>17 can smuggle it in either on their person or in their</p> <p>18 person. So that when they're booked, they would have</p> <p>19 the contraband, if you will, on them prior to arrest and</p> <p>20 prior to being booked. And then when they're booked,</p> <p>21 it's brought into the facility.</p> <p>22 Another method is having it sent in by</p> <p>23 friends or family using the mail system. And then it</p> <p>24 could be introduced into the facility either through</p> <p>25 contractor, employees and delivered to the inmate.</p>	<p style="text-align: right;">Page 97</p> <p>1 pills that were described as blue pills with the M30</p> <p>2 marking on them, and then other unknown white substances</p> <p>3 is how it's defined or how it's described. And I</p> <p>4 believe we also saw some marijuana, or a substance</p> <p>5 believed to be marijuana.</p> <p>6 Q. Do you personally recall ever finding an inmate</p> <p>7 in possession of opioids?</p> <p>8 A. Can you repeat the question?</p> <p>9 Q. Yeah.</p> <p>10 Do you ever recall finding an inmate in</p> <p>11 possession of opioids?</p> <p>12 A. Personally, no. But the search is not</p> <p>13 something that I would have performed in my capacity.</p> <p>14 Now, our staff conducting the actual</p> <p>15 searches would. If they found a substance, then they</p> <p>16 would turn it over to the medical department for</p> <p>17 identification or turn it over to narcotics or to CID</p> <p>18 for identification. I would not have gotten the</p> <p>19 information -- the final determination of what the</p> <p>20 substance found was officially identified as.</p> <p>21 Q. Okay.</p> <p>22 And I think earlier and -- correct me if</p> <p>23 I'm wrong -- earlier you testified that your specific</p> <p>24 work experience in Tarrant County, you didn't believe it</p> <p>25 made you knowledgeable to speak to the role of opioids</p>

<p style="text-align: right;">Page 98</p> <p>1 in Tarrant County specifically.</p> <p>2 Do you think your knowledge -- that your</p> <p>3 experience makes you knowledge able as to the detention</p> <p>4 center and the effect opioids have had?</p> <p>5 MS. AYACHI: Objection, form.</p> <p>6 A. Yes.</p> <p>7 Q. (BY MS. HARRIS) Okay.</p> <p>8 What effect would you say in your</p> <p>9 experience the impact opioids have had in the Tarrant</p> <p>10 County jail system?</p> <p>11 A. So I think the -- just -- we'll just call it</p> <p>12 the "drug problem." It's effect on the jail has been</p> <p>13 that there is -- obviously, we have an increase in -- or</p> <p>14 we see a prevalence of overdoses, of inmates hoarding</p> <p>15 medication for use either to abuse it or even to try to</p> <p>16 attempt suicide or to use it as currency or to sell it</p> <p>17 in the jail.</p> <p>18 Also there's an -- with an increase in the</p> <p>19 number of individuals who are on detox protocols. It's</p> <p>20 requiring a higher level of more frequent observation</p> <p>21 checks. So there's an impact on staffing and the use of</p> <p>22 our available housing.</p> <p>23 Also with the -- with the number of inmates</p> <p>24 who are falling under these detox protocols, there's an</p> <p>25 increased demand on the need for medical and mental</p>	<p style="text-align: right;">Page 100</p> <p>1 tested positive. CID has been notified. The inmate has</p> <p>2 been in jail for 30 days."</p> <p>3 Do you recall this email?</p> <p>4 (Exhibit 27 marked.)</p> <p>5 A. No.</p> <p>6 Q. (BY MS. HARRIS) All right.</p> <p>7 No reason to think you didn't get it</p> <p>8 though, correct?</p> <p>9 A. Correct.</p> <p>10 Q. What is a kite?</p> <p>11 A. A kite is a written communication that inmates</p> <p>12 have access to -- to communicate -- a written system</p> <p>13 that can either be -- let's see in 2017 -- it can either</p> <p>14 be a physical, written letter or done through electronic</p> <p>15 means, but it's a term. That's why they put it in</p> <p>16 quotes. It's a term that's used to describe how inmates</p> <p>17 will communicate with staff or other areas of the</p> <p>18 sheriff's office.</p> <p>19 Q. All right.</p> <p>20 And since -- you mentioned the inmate had</p> <p>21 been in jail for 30 days. So it's more likely than not</p> <p>22 that he took possession of the black tar heroin after</p> <p>23 being in jail; is that correct?</p> <p>24 MS. AYACHI: Objection, form.</p> <p>25 A. Correct.</p>
<p style="text-align: right;">Page 99</p> <p>1 health professionals within the jail.</p> <p>2 Q. And when you're --</p> <p>3 A. Sorry.</p> <p>4 Q. I'm sorry. I apologize for interrupting you.</p> <p>5 A. And the contraband issues also has a huge</p> <p>6 impact on the safety and security concerns we have</p> <p>7 because we have to try to, you know, stop the</p> <p>8 introduction of contraband into the facility, and so</p> <p>9 we've had to, you know, implement other safety and</p> <p>10 security measures and programs such as, you know,</p> <p>11 changes in how we do inmate mail.</p> <p>12 Q. And thank you for that.</p> <p>13 And as you've been discussing the impact,</p> <p>14 you're including in what has caused the impact? Things</p> <p>15 like fentanyl, heroin, cocaine, as well as pills?</p> <p>16 You're including everything that has contributed to that</p> <p>17 impact; is that correct?</p> <p>18 A. That's correct.</p> <p>19 Q. All right.</p> <p>20 Let's turn to Tab 29, and I'll mark that</p> <p>21 Exhibit 27. And I will direct your attention to the</p> <p>22 bottom email. And it's December 19, 2017, where you</p> <p>23 wrote (as read): "Captain Pilkington advised that a</p> <p>24 search of an inmate in response to an anonymous kite was</p> <p>25 conducted and black tar heroin was found. The substance</p>	<p style="text-align: right;">Page 101</p> <p>1 Q. (BY MS. HARRIS) All right.</p> <p>2 Let's turn to Tab 30, which I will mark as</p> <p>3 Exhibit 28. And it's a memo from David Grantham, and</p> <p>4 it's regarding (as read): "Contraband at Green Bay.</p> <p>5 Possible officers in involved, January 28, 2018. And</p> <p>6 I'll give you a chance to look at this.</p> <p>7 Do you recall this memo?</p> <p>8 (Exhibit 28 marked.)</p> <p>9 A. Not specifically.</p> <p>10 Q. (BY MS. HARRIS) No reason to think you didn't</p> <p>11 receive it, though, correct?</p> <p>12 A. Correct.</p> <p>13 Q. Looking at the second paragraph, third line is</p> <p>14 talking about that (as read): "Noel manages the</p> <p>15 trustees and uses that position."</p> <p>16 What does "trustees" mean in that context?</p> <p>17 A. Trustees is a term that's used by some of the</p> <p>18 employees here to refer to inmates who have either</p> <p>19 duties, job assignment in the jail.</p> <p>20 Q. Do you have any knowledge on whether these</p> <p>21 allegations were investigated or the results of the</p> <p>22 investigation?</p> <p>23 MS. AYACHI: Objection, form.</p> <p>24 A. I don't recall. Something like this would have</p> <p>25 been forwarded to our CID or even internal affairs. I</p>

<p style="text-align: right;">Page 102</p> <p>1 don't recall a specific outcome of an investigation 2 relating to this -- these specific allegations. 3 Q. (BY MS. HARRIS) Let's turn back to Tab 27, 4 which will be Exhibit 29. And I'll start off with the 5 bottom email, but I'll give you a second to review it. 6 (Exhibit 29 marked.) 7 A. Okay. 8 Q. (BY MS. HARRIS) In your email on January 29th 9 at the bottom of Page 1, January 29, 2018, you cc'd Raul 10 Banasco. 11 Who is Raul? 12 A. At the time, Raul Banasco was the executive 13 chief deputy of the jail. He was the jail 14 administrator. 15 Q. Okay. 16 And this is concerning the back tar heroin 17 we just discussed in Tab 29. 18 Do you recall anything about the facts of 19 this incident? 20 A. Not specifically. 21 Q. Okay. 22 Do you recall if IAD was ever brought in? 23 A. I don't recall. The individual that I sent 24 this to was the commander over narcotics. I sent it to 25 CID. That's Chief Vennum, and then, I guess, he looped</p>	<p style="text-align: right;">Page 104</p> <p>1 Q. Okay. 2 Was -- this information request, was it 3 related to the opioid litigation? Do you recall? 4 A. I don't recall. He just asked a question, and 5 I got with medical on it. 6 Q. And the detox protocol that could have been 7 from anything from fentanyl to heroin to any kind of 8 opioid, correct? 9 A. Correct. It could even include alcohol. 10 Q. Includes everything. Alcohol, correct, yes. 11 And was it your understanding that JPS did 12 not track those detox numbers specifically at that 13 point? 14 A. Yes, I believe that was Brandi's responsibility 15 to track the numbers. 16 Q. Do you know if they tracked those numbers now? 17 A. I don't know. 18 Q. All right. 19 And then on Page 1 of that tab, there -- in 20 the middle, there's an email from you to Chief Cundiff. 21 It says you reached out to JPS and Classification. 22 Who is Classification? 23 A. So Classification is a section within the jail 24 on what's called the support side, the support division, 25 of the jail that basically manages inmate records and</p>
<p style="text-align: right;">Page 103</p> <p>1 in Calvin Bond, who at the time was the commander over 2 narcotics. 3 Q. Let's turn to Tab 25, which I'll mark as 4 Exhibit 30. 5 And do you recall this email? 6 (Exhibit 30 marked.) 7 A. No. 8 Q. (BY MS. HARRIS) Okay. 9 Any reason to think you didn't receive it? 10 A. No. 11 Q. All right. 12 If you'll turn to Page 2 of that exhibit. 13 There's an email from you to Brandi Brazil. And I 14 believe she was the JPS Correctional Health project 15 manager; is that your recollection? 16 A. I think so. Project manager/business manager. 17 Something like that. 18 Q. And it's dated December 11, 2018. And it looks 19 like you were asking (as read): "If JPS kept any stats 20 on the number of inmates who were placed under detox 21 protocol at intake." And it says you've been asked what 22 the opioid impact has been on jail. 23 Do you know who asked you for that 24 information? 25 A. I believe it was a sheriff.</p>	<p style="text-align: right;">Page 105</p> <p>1 oversees all of the intake. It's part of -- if you 2 will, they're like an arm of booking. They assist with 3 the intake screening of all inmates and determine inmate 4 housing. 5 Q. Do you know if there's ever any follow up on 6 this one from anyone? Did anyone ever follow up with 7 you on any of this -- 8 A. Not that I can recall. 9 Q. -- on tracking the number of inmates on detox? 10 A. Not that I can recall. I think it ended there. 11 I checked for the information. Nobody tracked or 12 provided it, and that's what I related to Cundiff. 13 Q. All right. 14 Let's look at Tab 31, which I'll mark as 15 Exhibit 31. It's an email from David McClelland, the 16 chief of staff, to yourself and Brandi Brazil. It's 17 dated December 18, 2018. 18 You recall this email? 19 (Exhibit 31 marked.) 20 A. No. 21 Q. (BY MS. HARRIS) Okay. 22 Any reason to believe you didn't receive 23 it? 24 A. No. 25 Q. All right.</p>

<p style="text-align: right;">Page 106</p> <p>1 And it looks like Chief McClelland asked</p> <p>2 people (as read): "To get numbers so we could give them</p> <p>3 to the civil attorneys. They're asking for hard costs</p> <p>4 of Narcan or detox in the jail."</p> <p>5 And I'm looking at it, also it goes to</p> <p>6 Craig Driskell. Who is Craig Driskell?</p> <p>7 A. Craig Driskell is one of the executive chief</p> <p>8 deputies. He is currently over Judicial and Internal</p> <p>9 Affairs.</p> <p>10 Q. And are most of the recipients -- or all of the</p> <p>11 recipients on this list chief deputies and up?</p> <p>12 A. You're talking about --</p> <p>13 Q. Yeah, I'm sorry. The bottom email from Chief</p> <p>14 McClelland on December 13, 2018. It's the bottom of the</p> <p>15 first page.</p> <p>16 A. That's correct, yes.</p> <p>17 Q. Do you know whether the costs for Narcan kits</p> <p>18 were ever tracked to the type of opioid used?</p> <p>19 A. I don't know.</p> <p>20 Q. Okay.</p> <p>21 Do you have an understanding as to Tarrant</p> <p>22 County Sheriff's Office, their initial purpose in</p> <p>23 purchasing Narcan -- one of their primary purposes in</p> <p>24 initially purchasing Narcan, do you understand what</p> <p>25 their -- let me scratch that. That is a horrible</p>	<p style="text-align: right;">Page 108</p> <p>1 thank you for your time.</p> <p>2 MS. HARRIS: And pass the witness.</p> <p>3 THE WITNESS: Thank you.</p> <p>4 MS. AYACHI: Quinn, did you have any</p> <p>5 questions for him?</p> <p>6 MR. FORD: No. Nothing for Albertsons.</p> <p>7 Thank you, Mr. Reyes.</p> <p>8 THE WITNESS: Thank you.</p> <p>9 MS. AYACHI: Anthony, do you have any</p> <p>10 questions.</p> <p>11 MR. RYAN: No. Nothing. I'm with Kroger.</p> <p>12 MS. AYACHI: My apologies, okay.</p> <p>13 In that case, you know, we thank you very</p> <p>14 much for your time. I don't have any questions for you.</p> <p>15 So we really appreciate the service to the county, and</p> <p>16 we wish you the best of luck in your retirement and hope</p> <p>17 that you find absolutely wonderful and fulfilling work</p> <p>18 ongoing. So thank you for your time today.</p> <p>19 THE WITNESS: Thank you.</p> <p>20 THE VIDEOGRAPHER: All right. We're off</p> <p>21 the record at 12:41 p.m.</p> <p>22 THE CERTIFIED STENOGRAPHER: Just quick</p> <p>23 housekeeping. Since this is federal, I have to ask.</p> <p>24 Are there any stipulations the parties want to add to</p> <p>25 the record?</p>
<p style="text-align: right;">Page 107</p> <p>1 question.</p> <p>2 Do you have any understanding as to Tarrant</p> <p>3 County Sheriff's Office's primary purchase in initially</p> <p>4 purchasing Narcan for its officers?</p> <p>5 A. No.</p> <p>6 Q. All right.</p> <p>7 And earlier I asked you if you had ever</p> <p>8 been to a Kroger. And I forgot to ask you if you'd ever</p> <p>9 been to an Albertsons or ever gotten a prescription</p> <p>10 filled at Albertsons?</p> <p>11 A. No, I have not. Well, I'm sure I've been to an</p> <p>12 Albertsons at sometime in my life, but I've never gotten</p> <p>13 a prescription fill.</p> <p>14 Q. So no experiences good or bad with Albertsons</p> <p>15 or Albertsons' pharmacies?</p> <p>16 A. Correct.</p> <p>17 MS. HARRIS: All right. If we can take a</p> <p>18 break. I am almost finished.</p> <p>19 THE VIDEOGRAPHER: All right. We're off</p> <p>20 the record at 12:30 p.m.</p> <p>21 (A break was taken from 12:30 p.m. to</p> <p>22 12:40 p.m.)</p> <p>23 THE VIDEOGRAPHER: We are back on the</p> <p>24 record at 12:40 p.m.</p> <p>25 Q. (BY MS. HARRIS) Mr. Reyes, I just want to</p>	<p style="text-align: right;">Page 109</p> <p>1 MS. HARRIS: I don't have any.</p> <p>2 MS. AYACHI: None from us.</p> <p>3 MR. FORD: None from Albertsons.</p> <p>4 (Proceedings concluded at 12:41 p.m.)</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

<p style="text-align: right;">Page 110</p> <p>1 UNITED STATES DISTRICT COURT 2 FOR THE NORTHERN DISTRICT OF OHIO 3 EASTERN DIVISION 4 IN RE: NATIONAL) MDL No. 2804 PRESCRIPTION OPIATE) Case No. 17-md-2804 LITIGATION) Judge Dan Aaron Polster 5) 6) 7) 8) 9 REPORTER'S CERTIFICATION DEPOSITION OF HENRY REYES August 17, 2023 10 11 That the deposition transcript was delivered 12 to Ms. Kimberly Harris. 13 That a copy of this certificate was served on 14 all parties and/or the witness shown herein on 15 _____. 16 I further certify that pursuant to FRCP 17 Rule 30(f)(1) that the signature of the deponent: 18 _____ was requested by the deponent or a party 19 before the completion of the deposition and that 20 signature is to be before any notary public and returned 21 within 30 days from date of receipt of the transcript. 22 If returned, the attached Changes and 23 Signature Page contains any changes and the reasons 24 therefore: 25 _____ was not requested by the deponent or a</p>	<p style="text-align: right;">Page 112</p> <p>1 Veritext Legal Solutions 2 1100 Superior Ave Suite 1820 3 Cleveland, Ohio 44114 Phone: 216-523-1313 4 September 1, 2023 5 To: Ms. Turner 6 Case Name: National Prescription Opiate Litigation - Track 9 (Tarrant 7 County) v. 8 Veritext Reference Number: 6055171 9 Witness: Henry Reyes Deposition Date: 8/17/2023 10 Dear Sir/Madam: 11 12 Enclosed please find a deposition transcript. Please have the witness 13 review the transcript and note any changes or corrections on the 14 included errata sheet, indicating the page, line number, change, and 15 the reason for the change. Have the witness' signature notarized and 16 forward the completed page(s) back to us at the Production address shown 17 above, or email to production-midwest@veritext.com. 18 19 If the errata is not returned within thirty days of your receipt of 20 this letter, the reading and signing will be deemed waived. 21 Sincerely, 22 Production Department 23 24 25 NO NOTARY REQUIRED IN CA</p>
<p style="text-align: right;">Page 111</p> <p>1 party before the completion of the deposition. 2 I certify that I am neither counsel for, 3 related to, nor employed by any of the parties or 4 attorneys in the action in which this proceeding was 5 taken, and further that I am not financially or 6 otherwise interested in the outcome of the action. 7 Certified to by me this 1st day of September, 8 2023. 9 10 11 12 13  14 ABIGAIL GUEKKA, Texas CSR 9059 Expiration Date: 02/28/24 VERITEXT LEGAL SOLUTIONS 15 Firm Registration No. 571 300 Throckmorton Street 16 Suite 1600 Fort Worth, Texas 76102 17 Phone: (817) 336-3042 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 113</p> <p>1 DEPOSITION REVIEW CERTIFICATION OF WITNESS 2 3 ASSIGNMENT REFERENCE NO: 6055171 CASE NAME: National Prescription Opiate Litigation - Track 9 (Tarrant County) v. DATE OF DEPOSITION: 8/17/2023 4 WITNESS' NAME: Henry Reyes 5 In accordance with the Rules of Civil Procedure, I have read the entire transcript of 6 my testimony or it has been read to me. 7 I have made no changes to the testimony as transcribed by the court reporter. 8 9 _____ Date Henry Reyes 10 Sworn to and subscribed before me, a Notary Public in and for the State and County, 11 the referenced witness did personally appear and acknowledge that: 12 They have read the transcript; 13 They signed the foregoing Sworn Statement; and 14 Their execution of this Statement is of their free act and deed. 15 I have affixed my name and official seal 16 this _____ day of _____, 20____. 17 18 _____ Notary Public 19 _____ Commission Expiration Date 20 21 22 23 24 25</p>

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1 DEPOSITION REVIEW
CERTIFICATION OF WITNESS

2

3 ASSIGNMENT REFERENCE NO: 6055171
CASE NAME: National Prescription Opiate Litigation - Track 9
(Tarrant County) v.
DATE OF DEPOSITION: 8/17/2023

4 WITNESS' NAME: Henry Reyes
5 In accordance with the Rules of Civil
Procedure, I have read the entire transcript of
6 my testimony or it has been read to me.
7 I have listed my changes on the attached
Errata Sheet, listing page and line numbers as
8 well as the reason(s) for the change(s).
9 I request that these changes be entered
as part of the record of my testimony.

10
11 I have executed the Errata Sheet, as well
as this Certificate, and request and authorize
12 that both be appended to the transcript of my
testimony and be incorporated therein.

13 _____
Date Henry Reyes

14
15 Sworn to and subscribed before me, a
Notary Public in and for the State and County,
the referenced witness did personally appear
16 and acknowledge that:
17 They have read the transcript;
They have listed all of their corrections
18 in the appended Errata Sheet;
They signed the foregoing Sworn
19 Statement; and
Their execution of this Statement is of
20 their free act and deed.
21 I have affixed my name and official seal
22 this _____ day of _____, 20____.
23 _____
Notary Public

24
25 _____
Commission Expiration Date

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1 ERRATA SHEET
VERITEXT LEGAL SOLUTIONS MIDWEST

2 ASSIGNMENT NO: 6055171

3 PAGE/LINE(S) / CHANGE /REASON

4 _____
5 _____
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17 _____
18 _____
19 _____

20 _____
Date Henry Reyes

21 SUBSCRIBED AND SWORN TO BEFORE ME THIS _____
22 DAY OF _____, 20____.
23 _____
Notary Public

24
25 _____
Commission Expiration Date

30 (Pages 114 - 115)